

# EXHIBIT 3

Marisa Carroll

2/1/2021

<p style="text-align: right;">Page 1</p> <p>IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA WESTERN DIVISION</p> <p>CASE NUMBER 7:19-cv-00403-RDP</p> <p>ADAM JONES and JOSHUA HASTINGS, Plaintiff(s), vs. BUZZFEED, INC., BUZZFEED NEWS, BEN SMITH, and KATIE J.M. BAKER, Defendant(s).</p> <p>VIDEO AND ZOOM DEPOSITION TESTIMONY OF: MARISA CARROLL</p> <p>FEBRUARY 1, 2021 9:01 a.m. COURT REPORTER: NANCY W. PANNELL, CCR The reading and signing of this deposition has been waived</p>	<p style="text-align: right;">Page 2</p> <p>1           S T I P U L A T I O N</p> <p>2           IT IS STIPULATED AND AGREED</p> <p>3       by and between the parties through their</p> <p>4       respective counsel that the VIDEO AND ZOOM</p> <p>5       DEPOSITION of MARISA CARROLL may be taken</p> <p>6       before Nancy W. Pannell, Certified</p> <p>7       Shorthand Reporter and Notary Public,</p> <p>8       State at Large, via video conference, on</p> <p>9       FEBRUARY 1, 2021, commencing at</p> <p>10      approximately 9:01 a m.</p> <p>11      IT IS FURTHER STIPULATED AND</p> <p>12      AGREED that the signature to and the</p> <p>13      reading of the deposition by the witness</p> <p>14      IS waived, the deposition to have the same</p> <p>15      force and effect as if full compliance had</p> <p>16      been had with all laws and rules of Court</p> <p>17      relating to the taking of depositions.</p> <p>18      IT IS FURTHER STIPULATED AND</p> <p>19      AGREED that it shall not be necessary for</p> <p>20      any objections to be made by counsel to</p> <p>21      any questions, except as to form or</p> <p>22      leading questions, and that counsel for</p> <p>23      the parties may make objections and assign</p>
<p style="text-align: right;">Page 3</p> <p>1       grounds at the time of trial or at the</p> <p>2       time said deposition is offered in</p> <p>3       evidence, or prior thereto.</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>	<p style="text-align: right;">Page 4</p> <p>1           I N D E X</p> <p>2</p> <p>3       EXAMINATION BY:           PAGE NO.</p> <p>4       MR. COCKRELL               10</p> <p>5       CERTIFICATE                 323</p> <p>6</p> <p>7</p> <p>8           INDEX OF EXHIBITS</p> <p>9</p> <p>10      PLAINTIFF'S EXHIBITS:       PAGE NO.</p> <p>11      45   1/25/17 email, BuzzFeed   156</p> <p>12      01172</p> <p>13      46   BuzzFeed 1158           164</p> <p>14      47   BuzzFeed 2164           172</p> <p>15      48   BuzzFeed 2528           180</p> <p>16      49   BuzzFeed 2570           189</p> <p>17      50   BuzzFeed 2620           192</p> <p>18      51   BuzzFeed 2527           196</p> <p>19      52   BuzzFeed 2346           210</p> <p>20      53   BuzzFeed 2475           213</p> <p>21      54   BuzzFeed 2471           221</p> <p>22      55   BuzzFeed 2472           228</p> <p>23      56   BuzzFeed 2663           233</p>

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13	69	BuzzFeed 716	293	13	MS. RACHEL STROM		
14				14	MS. KATHERINE M. BOLGER		
15				15	DAVIS, WRIGHT, TREMAINE, LLP		
16				16	1251 AVENUE OF THE AMERICAS		
17				17	21ST FLOOR		
18				18	NEW YORK, NEW YORK, 10020-1104		
19				19			
20				20	MR. JOHN G. "JT" THOMPSON (via Zoom)		
21				21	LIGHTFOOT FRANKLIN & WHITE		
22				22	400 NORTH 20TH STREET		
23				23	THE CLARK BUILDING		

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1	BIRMINGHAM, ALABAMA, 35203			1	I, Nancy W. Pannell, a		
2				2	Certified Shorthand Reporter of		
3				3	Birmingham, Alabama, and a Notary Public		
4	ALSO PRESENT:			4	for the State of Alabama at Large, acting		
5	Nancy Pannell, @Birmingham Reporting			5	as Commissioner, certify that on this		
6	WorkSouth Tuscaloosa Office			6	date, pursuant to the Federal Rules of		
7	Trevor Webster, Birmingham Reporting			7	Civil Procedure and the foregoing		
8	Zoom Host			8	stipulation of counsel, there came before		
9				9	me via video-conference, commencing at		
10				10	approximately 9:01 a m. on FEBRUARY 1,		
11				11	2021, MARISA CARROLL, witness in the above		
12				12	cause, for oral examination, whereupon the		
13				13	following proceedings were had:		
14				14			
15				15			
16				16	VIDEOGRAPHER: We are now on		
17				17	the record. This is the video deposition		
18				18	of Marisa Carroll in the matter of Adam		
19				19	Jones, et al., versus BuzzFeed, Inc., et		
20				20	al., Case Number 7:19-cv-00403-RDP in the		
21				21	United States District Court for the		
22				22	Northern District of Alabama, Western		
23				23	Division.		

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<p>1 Today's date is February 1, 2 2021 and the time is 9:01 a.m. Would 3 counsel and all present please introduce 4 yourself into the record, after which the 5 court reporter will swear in the witness. 6 MS. STROM: Bob, you want to 7 go first? 8 MR. COCKRELL: Okay, I'll go 9 first. Bob Cockrell for the plaintiffs. 10 MR. RITCHEY: Scotch Ritchey 11 for the plaintiffs. 12 MS. STROM: Rachel Strom, 13 counsel for Marisa Carroll as well as the 14 defendants. 15 MR. THOMPSON: JT Thompson 16 also here for the defendants. 17 MS. BOLGER: And Kate Bolger 18 also here for the defendants. 19 MARISA CARROLL, 20 having been first duly sworn, was examined 21 and testified as follows: 22 COURT REPORTER: Thank you. 23 Will this be usual stipulations?</p>	<p>1 MR. COCKRELL: Yes. 2 MS. STROM: Yes. 3 EXAMINATION 4 BY MR. COCKRELL: 5 Q. Ms. Carroll, my name is Bob 6 Cockrell. I represent the plaintiffs. 7 Just got a few questions for you. 8 Do you still work at BuzzFeed? 9 A. I do not work at BuzzFeed. 10 Q. Where are you employed now? 11 A. I work at New York Magazine. 12 Q. Okay. And what are you doing 13 there? 14 A. I'm an editor of -- features 15 editor at New York Magazine. 16 Q. Okay. All right. And have you 17 ever given a deposition before? 18 A. I have never given a deposition 19 before. 20 Q. Okay. I've just got a few rules 21 I'll kind of go over real quick, and the 22 first one is if you need a break, just 23 tell me and you get one, okay?</p>
Page 11	Page 12
<p>1 And if I ask a question you didn't 2 hear, just tell me and I'll repeat it. If 3 -- and I've got this southern dialect so 4 you may have a little trouble with it. 5 But if you didn't understand a 6 question I ask, I'll be glad to rephrase 7 it or explain what I'm asking if you just 8 let me know, and I guess we'll get started 9 on that. 10 Would you please state your 11 name -- full name for the record? 12 A. Yes, my is Marisa Terese Carroll. 13 Q. Okay. And what's your date of 14 birth? 15 A. [REDACTED]. 16 Q. All right. [REDACTED] 17 [REDACTED] 18 And are you married? 19 A. Yes, I'm married. 20 Q. And who are you married to? 21 A. I'm married to Liam Lowery. 22 Q. And is this your first marriage? 23 A. This is my first marriage.</p>	<p>1 Q. And do you have any children? 2 A. No, I do not have any children. 3 Q. Okay. Do you have any 4 stepchildren? 5 A. No, I do not. 6 Q. Okay. All right. 7 And how long have y'all been 8 married? 9 A. I have been married for six years. 10 Q. And where were you born? 11 A. I was born in Chicago, Illinois. 12 Q. And is that where you grew up? 13 A. Yes, I grew up in Chicago. 14 Q. I'm going to take a little time 15 every once in a while to save us time, 16 okay. Check off stuff you've already 17 answered. 18 And what is your current address? 19 A. My address -- 20 MS. STROM: If you prefer, 21 you can send anything to my attention, if 22 you don't want to give your personal 23 address, but if you're comfortable doing</p>

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<p>1 it, Marisa, that's fine.</p> <p>2 Q. (By Mr. Cockrell) New York City?</p> <p>3 That's really all I care about.</p> <p>4 A. Yeah, I live in -- I live in</p> <p>5 Queens, New York.</p> <p>6 Q. Okay. That's sufficient.</p> <p>7 And do you work out of an office</p> <p>8 or do you work remotely from home? How do</p> <p>9 you do that at your current job?</p> <p>10 A. During the COVID Pandemic I've</p> <p>11 been working from home.</p> <p>12 Q. Otherwise, you would be at your</p> <p>13 office in New York?</p> <p>14 A. Before COVID, I would go into the</p> <p>15 office in New York.</p> <p>16 Q. And how long have you been with</p> <p>17 this current employer?</p> <p>18 A. I've been with my employer for a</p> <p>19 little under two years.</p> <p>20 Q. All right. And we'll go through</p> <p>21 your work history in a little bit -- a</p> <p>22 little bit later.</p> <p>23 Do you have Facebook?</p>	<p>1 A. I have a Facebook account that I</p> <p>2 haven't used to post in maybe ten years.</p> <p>3 Q. Okay. All right.</p> <p>4 Did you have a business Facebook</p> <p>5 account while you were at BuzzFeed or an</p> <p>6 account there that you posted on?</p> <p>7 A. I believe that my Facebook is</p> <p>8 affiliated with my BuzzFeed email.</p> <p>9 Q. Okay. Do you have any other kind</p> <p>10 of social media accounts?</p> <p>11 A. To my best recollection, I have a</p> <p>12 Twitter account and an Instagram account.</p> <p>13 Q. Would those just be your name?</p> <p>14 A. As I recall, yes, those would both</p> <p>15 be associated with my name.</p> <p>16 Q. Did you have those in June 22nd of</p> <p>17 2017 or prior to that? Did you have those</p> <p>18 accounts, those social media accounts?</p> <p>19 A. As I recall, yes, I did.</p> <p>20 Q. Can you kind of start from high</p> <p>21 school and tell me your educational</p> <p>22 background and I want to know what college</p> <p>23 or university and the years you attended</p>
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<p>1 and what degrees you have.</p> <p>2 A. I went to Walter Payton College</p> <p>3 Prep in Chicago, Illinois for high school.</p> <p>4 After high school I went to Fordham</p> <p>5 University in New York, a Catholic</p> <p>6 University in New York, where my major was</p> <p>7 history.</p> <p>8 That's what -- I haven't looked at</p> <p>9 my résumé in a long time but that's my</p> <p>10 best recollection.</p> <p>11 Q. Did Fordham University have a</p> <p>12 journalism school?</p> <p>13 A. There's a few different campuses</p> <p>14 of Fordham University. I believe the</p> <p>15 campus that I did not attend had the</p> <p>16 journalism school.</p> <p>17 Q. Okay. Have you attended any</p> <p>18 journalism schools?</p> <p>19 A. No, I attended undergrad at</p> <p>20 Fordham University.</p> <p>21 Q. Okay. Have you told me all your</p> <p>22 undergrad schools you've been to?</p> <p>23 A. Yes, I only went to Fordham</p>	<p>1 University for undergrad.</p> <p>2 Q. What years were you there?</p> <p>3 A. To the best of my recollection, I</p> <p>4 was there from [REDACTED]</p> <p>5 Q. And what was your degree in that</p> <p>6 you achieved?</p> <p>7 A. I believe to my recollection</p> <p>8 history.</p> <p>9 Q. I've got a history minor myself.</p> <p>10 Okay.</p> <p>11 Let's see now, did you have any</p> <p>12 postgraduate schools that you attended?</p> <p>13 A. No, postgraduate I went straight</p> <p>14 to work in journalism.</p> <p>15 Q. I'm going to get to your work</p> <p>16 history in just a minute and we'll go</p> <p>17 through that.</p> <p>18 While you were at Fordham, did you</p> <p>19 take any courses in journalism period?</p> <p>20 A. I did internships, so rather than</p> <p>21 courses I did internships in journalism.</p> <p>22 Q. Was that at Fordham?</p> <p>23 A. While at Fordham, yes.</p>

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<p style="text-align: right;">Page 17</p> <p>1 Q. Okay. What internships did you 2 do? 3 A. The Nation Magazine, I was a fact 4 checker. 5 Q. What years would that have been? 6 A. I can't recall, but it's in the 7 period that I was -- 8 Q. In college? 9 A. -- between [REDACTED]. I don't 10 want to give you the wrong dates. 11 Q. That's fine. I don't want you to 12 guess on anything I ask you today. Just 13 do the best you can. 14 Okay. What was involved in being 15 a fact checker? 16 A. When I was a fact checker, I would 17 review the facts in a draft of a story and 18 work with a reporter to make sure that 19 they were correct and most accurate. 20 Q. And did they give you any kind of 21 training or anything to make -- have you 22 become a fact checker with the -- 23 A. Yes --</p>	<p style="text-align: right;">Page 18</p> <p>1 Q. -- excuse me, with the Nation 2 Magazine? 3 A. Yes, they do. 4 Q. And what kind of training did they 5 give you? 6 A. They teach you how to -- how to go 7 about fact-checking, so you work with a 8 manager who shows you how to do it. 9 They also had seminars where you 10 talk to other reporters and fact checkers 11 who have been through it who would give 12 you feedback. 13 Q. Were you paid anything for this 14 internship? 15 A. I was. 16 Q. And how much did they pay you to 17 be a fact checker? 18 A. They paid you \$250 a week is my 19 recollection of the fee. 20 Q. Okay. How did you get the job as 21 a fact checker with Nation Magazine? 22 A. I applied -- to my knowledge, I 23 applied to their job portal, but the woman</p>
<p style="text-align: right;">Page 19</p> <p>1 who ran the fact-checking department was 2 the editor-in-chief at the college 3 newspaper where I was a college newspaper 4 reporter and editor. 5 Q. That was my next question for you. 6 Did you write for the college newspaper 7 for Fordham? 8 A. I wrote and later became the 9 editor-in-chief of the newspaper. 10 Q. Congratulations. That's pretty 11 good. 12 Now, during that time did you 13 write any stories on sex abuse or rape of 14 any kind like that? 15 A. I don't want to say something I 16 don't remember, so I'm going to say I 17 don't remember specifically. 18 Q. Did they give you any courses or 19 seminars on journalism ethics when you 20 were there at Nation Magazine? 21 A. Ethics is something that comes up 22 in every conversation you have with a 23 manager I say, so, yeah.</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. Was there any formal courses or 2 seminars you attended regarding journalism 3 ethics while you were at Nation Magazine? 4 A. Can you tell me more what you mean 5 when you say a formal course or a seminar? 6 For instance, would a seminar be 7 where you're sitting in a room and someone 8 is talking -- like someone's talking to 9 the group? 10 Q. Yes, that, or providing written 11 materials or making a presentation on 12 journalism ethics. 13 I know as a lawyer we have those. 14 We have classes in legal ethics. And I'm 15 just asking if they provided anything for 16 the magazine with regards to journalism 17 ethics? 18 A. I remember receiving presentations 19 from journalists and editors that involved 20 ethics, but I can't say -- I can't recall 21 specifically a formal class, for instance. 22 Q. Did they provide written materials 23 at those seminars --</p>

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<p style="text-align: right;">Page 21</p> <p>1 MS. STROM: Objection --</p> <p>2 Q. (By Mr. Cockrell) -- you just</p> <p>3 referred to?</p> <p>4 MS. STROM: Go ahead, sorry,</p> <p>5 Marisa.</p> <p>6 A. I can't recall.</p> <p>7 Q. (By Mr. Cockrell) Would you have</p> <p>8 saved any of them? I know you can't</p> <p>9 recall if they provided them or not, but</p> <p>10 do you have a file of your time as an</p> <p>11 internship --</p> <p>12 MS. STROM: Objection, you</p> <p>13 can answer --</p> <p>14 Q. (By Mr. Cockrell) -- with Nation</p> <p>15 Magazine?</p> <p>16 Where you would have included any</p> <p>17 seminars or written material with regard</p> <p>18 to journalism or journalism ethics?</p> <p>19 A. I'm looking around in my office.</p> <p>20 No, I don't have files from that time.</p> <p>21 Q. Okay. All right. Hold on one</p> <p>22 second.</p> <p>23 Do you recall any of the</p>	<p style="text-align: right;">Page 22</p> <p>1 instructors for those seminars that you</p> <p>2 had that included journalism ethics, the</p> <p>3 name of any instructors?</p> <p>4 A. I wouldn't use the word</p> <p>5 instructors. Just to clarify, I'm</p> <p>6 speaking to seminars given by staff</p> <p>7 members and reporters for the magazine who</p> <p>8 would talk about these things. I remember</p> <p>9 Richard Kim.</p> <p>10 Q. What do you remember, Mr. Kim</p> <p>11 presenting to you?</p> <p>12 A. Richard Kim was, I believe at the</p> <p>13 time, the executive editor of the magazine</p> <p>14 and was one of many presentations that</p> <p>15 were given to answer questions about</p> <p>16 reporting, fact-checking, ethics.</p> <p>17 Q. Did Nation Magazine have a</p> <p>18 standard operating procedure or written</p> <p>19 protocol for reporting while you were</p> <p>20 there?</p> <p>21 A. I think it wouldn't surprise me,</p> <p>22 but I don't remember. I really just can't</p> <p>23 remember back to that time.</p>
<p style="text-align: right;">Page 23</p> <p>1 Q. Do you remember reading a policy</p> <p>2 or standard operating procedure when you</p> <p>3 were hired there as an intern?</p> <p>4 MS. STROM: Objection.</p> <p>5 You can answer, Marisa.</p> <p>6 A. I also just can't remember.</p> <p>7 Q. (By Mr. Cockrell) Have you ever</p> <p>8 taken a course in media law?</p> <p>9 A. I've never taken a college course</p> <p>10 in media law. Annually when I was at</p> <p>11 BuzzFeed we would get a refresher on media</p> <p>12 law, defamation law through our counsel</p> <p>13 there that employees were required to</p> <p>14 attend.</p> <p>15 Q. Who was the counsel there?</p> <p>16 A. The -- I can't remember her title,</p> <p>17 but the chief in-house counsel at the time</p> <p>18 was Nabiha Syed.</p> <p>19 Q. I'm sorry? Say that one more</p> <p>20 time.</p> <p>21 A. Nabiha Syed.</p> <p>22 Q. Can you spell that for me?</p> <p>23 A. I believe it's N-a-b-i-h-a.</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. Uh-huh (affirmative).</p> <p>2 A. S-y-e-d.</p> <p>3 Q. S-y-e-d?</p> <p>4 A. To my recollection.</p> <p>5 Q. Is she still there, do you know?</p> <p>6 A. I don't believe so, but I don't</p> <p>7 know if she had some sort of ongoing</p> <p>8 relationship I'm not familiar with.</p> <p>9 Q. But she was in-house counsel for</p> <p>10 BuzzFeed?</p> <p>11 A. She was.</p> <p>12 Q. Now, did she provide written</p> <p>13 material to the attendees of this annual</p> <p>14 seminar?</p> <p>15 A. I know that there was a PowerPoint</p> <p>16 presentation. I can't remember the answer</p> <p>17 to written material though.</p> <p>18 Q. And how many years were you at</p> <p>19 BuzzFeed?</p> <p>20 A. I was at BuzzFeed for almost four</p> <p>21 years --</p> <p>22 Q. And did -- I'm sorry, go ahead. I</p> <p>23 didn't mean to interrupt you.</p>

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<p>1 A. Is the number of years I remember.</p> <p>2 Q. Okay. Did BuzzFeed have a written</p> <p>3 policy or standard operating procedure</p> <p>4 provided to its employees?</p> <p>5 MS. STROM: Objection.</p> <p>6 I don't know exactly what</p> <p>7 you mean, but if you do, Marisa, please</p> <p>8 answer.</p> <p>9 A. I have the same question. I don't</p> <p>10 know what you mean.</p> <p>11 Q. (By Mr. Cockrell) A written policy</p> <p>12 of how they conduct their business.</p> <p>13 MS. STROM: Objection.</p> <p>14 But if you get it, Marisa,</p> <p>15 please answer.</p> <p>16 A. I don't, I'm sorry.</p> <p>17 Q. (By Mr. Cockrell) Did they provide</p> <p>18 you with any written policies while you</p> <p>19 were working at BuzzFeed?</p> <p>20 A. I know there was a number of</p> <p>21 policies that -- I don't know if you would</p> <p>22 call them a policy, but from your contract</p> <p>23 to take the job to your, you know, having</p>	<p>1 to do a sexual harassment training every</p> <p>2 year that was standard, to having to do --</p> <p>3 I know there were many such policies that</p> <p>4 came with doing the job.</p> <p>5 Q. Was there any written policy on</p> <p>6 journalism ethics that you recall, even a</p> <p>7 section of a policy?</p> <p>8 A. My recollection is that there's a</p> <p>9 standards guide that is available to</p> <p>10 employees and is available online.</p> <p>11 Q. Do you know what the title of that</p> <p>12 policy is?</p> <p>13 A. I can't recall what the title was</p> <p>14 at the time.</p> <p>15 Q. Do you know what it is now?</p> <p>16 A. No, because I just -- I don't work</p> <p>17 there any more so I haven't touched back.</p> <p>18 Q. Sure. Did you save a copy of it?</p> <p>19 A. I know it's available online.</p> <p>20 Q. Okay. How is it available online?</p> <p>21 A. I don't remember the URL, but it's</p> <p>22 an available document.</p> <p>23 Q. And who is it available to?</p>
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<p>1 A. My recollection is that's it's</p> <p>2 available to the public as a show of</p> <p>3 transparency.</p> <p>4 Q. Okay. All right. Thank you.</p> <p>5 Do you know who maintains that</p> <p>6 policy at BuzzFeed?</p> <p>7 A. I really don't. Sorry.</p> <p>8 Q. Do you know what department?</p> <p>9 A. I haven't worked there in two</p> <p>10 years, so I don't know.</p> <p>11 Q. Well, I guess I'm asking more --</p> <p>12 I'm really concerned more when you were</p> <p>13 employed there.</p> <p>14 Do you know who would have -- what</p> <p>15 department would have handled that at</p> <p>16 BuzzFeed?</p> <p>17 A. Many staff were involved in coming</p> <p>18 up with those policies. I would say the</p> <p>19 buck stops with Ben Smith, who is the</p> <p>20 editor-in-chief, because he, as in any</p> <p>21 organization, the editor-in-chief is the</p> <p>22 boss.</p> <p>23 Q. Okay. So he would know more about</p>	<p>1 it than you would; is that correct?</p> <p>2 A. If you asked him about it, he may</p> <p>3 also be able to tell you that I'm wrong,</p> <p>4 but if you ask him, he would be able to</p> <p>5 tell you.</p> <p>6 That's just my recollection, but I</p> <p>7 wasn't -- you know, that's just my</p> <p>8 recollection from the time.</p> <p>9 Q. Okay. Do you recall reading it</p> <p>10 while you were there?</p> <p>11 A. I can't -- ethics was something</p> <p>12 and standards and practices were something</p> <p>13 that we discussed and that came up every</p> <p>14 day.</p> <p>15 I would assume that it's something</p> <p>16 I read, but I can't remember -- I don't</p> <p>17 have a picture perfect memory of sitting</p> <p>18 in front of something on a certain day and</p> <p>19 saying, that's why I don't want to give</p> <p>20 you -- I don't want to guess.</p> <p>21 Q. That's fine. Just your</p> <p>22 recollection, that's okay.</p> <p>23 A. All right.</p>

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<p>1 Q. Now, you don't know who would have 2 kept this policy at BuzzFeed? 3 MS. STROM: Objection, 4 objection. I believe that's asked and 5 answered. 6 But you can answer, Marisa. 7 A. I believe it would be Ben Smith, 8 the editor-in-chief, and he could probably 9 give you a more specific answer as to who 10 was in charge. 11 Q. (By Mr. Cockrell) Okay. All 12 right. Thank you. 13 All right. So you worked at the 14 intern -- I mean you did the internship 15 and worked at Nation Magazine. What type 16 magazine was that? 17 A. A politics magazine. 18 Q. What type -- I guess you did 19 political stories, but did it have a lean 20 as to more a conservative or a liberal 21 approach to its writing, the magazine? 22 A. To my recollection it had 23 different perspectives on the political</p>	<p>1 issues of the day. 2 Q. Did you write any of those stories 3 at the magazine? 4 A. I wrote one story when I was at 5 the magazine, which I remember because I 6 was very proud, because I got a very short 7 article into the magazine, and it was 8 about -- it was reporting on -- I can't 9 remember what the content was, but it was 10 about -- this was at the time of the 11 Affordable Care Act and it was about the 12 people responding to what had gone on with 13 the Affordable Care Act, and I believe it 14 was like 300 words long. It was short. 15 Q. Okay. What was the title of it? 16 A. I was very proud. 17 Q. What was the title of it? 18 A. Oh, I can't recall. 19 Q. Okay. All right. Do you remember 20 when that would have been? 21 I know it would have been during 22 your time there as an intern, but do you 23 remember what year it would have been?</p>
Page 31	Page 32
<p>1 A. Whatever year I was an intern. I 2 would feel like it was 2012, but I don't 3 want to misspeak. 4 Q. Okay. And how many stories did 5 you write while you were editor -- well, 6 while you were at the school newspaper at 7 Fordham? How many stories would you have 8 written? 9 A. Oh, my gosh. Many. 10 Q. More than ten? 11 A. I can -- certainly more than ten. 12 Q. Do they keep those logs at Fordham 13 University of old stories that everybody 14 wrote and those kind of things? 15 A. At the time they kept them in the 16 basement where the newsroom was in print. 17 We were not very tech savvy. 18 Q. Y'all were a lot like I am right 19 now. I'm would much rather be in person 20 talking to you than over a computer, but I 21 understand. 22 So while you were at -- you were 23 there, where was the next place you went</p>	<p>1 to work after Nation Magazine? 2 A. I was a fact checker and then I 3 edited interviews at Guernica, which is an 4 arts magazine, online -- an online arts 5 magazine. 6 Q. And where are they headquartered 7 at? 8 A. New York City. But it was all 9 remote and digital and unpaid so it was -- 10 so it was a -- I was in New York. I 11 believe people were all over the country. 12 Q. So you weren't paid for that job? 13 A. No, I was not. 14 Q. Okay. What are you trying to do, 15 just get some experience or something? 16 A. Correct. 17 Q. That kind of thing. Did you write 18 articles for that magazine, the art 19 magazine? 20 A. I believe I did, but I remember 21 the primary part of my job was 22 fact-checking. 23 Q. All right. And what years were</p>

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<p style="text-align: right;">Page 33</p> <p>1 you with the art magazine?</p> <p>2 A. To the best of my recollection</p> <p>3 [REDACTED] before -- in the time leading up to</p> <p>4 graduating from college.</p> <p>5 Q. Okay. I'm just asking, the reason</p> <p>6 for leaving the Nation Magazine was that</p> <p>7 just because you graduated and the</p> <p>8 internship was over?</p> <p>9 A. The internship ended. I was an</p> <p>10 intern, and then I stayed on for a couple</p> <p>11 more months in a freelance role perhaps</p> <p>12 because someone was on maternity leave,</p> <p>13 but it was not a forever job. It was just</p> <p>14 an internship while I was still a student</p> <p>15 in college.</p> <p>16 Q. Okay. And so then you take the</p> <p>17 job with the art magazine and how long</p> <p>18 were you with them?</p> <p>19 A. My best recollection is that it</p> <p>20 would be approximately one semester in the</p> <p>21 time -- in my last year at Fordham.</p> <p>22 Possibly two semesters, but I don't</p> <p>23 remember exactly.</p>	<p style="text-align: right;">Page 34</p> <p>1 Q. All right. Now, let's see, after</p> <p>2 you left the art magazine where did you</p> <p>3 go?</p> <p>4 A. I went to Marie Claire Magazine</p> <p>5 upon graduating from college.</p> <p>6 Q. So the art magazine you were still</p> <p>7 in college when you were working for them?</p> <p>8 A. Yes.</p> <p>9 Q. So would this have been your first</p> <p>10 really job, permanent job at Marie Claire</p> <p>11 Magazine?</p> <p>12 A. Well, throughout New York I was</p> <p>13 getting paid working at the New York</p> <p>14 Botanical Garden as a guest services</p> <p>15 assistant --</p> <p>16 Q. Okay.</p> <p>17 A. -- so that was a job that I was</p> <p>18 doing throughout college to pay the bills.</p> <p>19 Q. All right. I've been there. I</p> <p>20 ran the New York City marathon twice, in</p> <p>21 my younger days, but nice place. Good</p> <p>22 place to work.</p> <p>23 All right. Tell me about Marie</p>
<p style="text-align: right;">Page 35</p> <p>1 Claire Magazine. What kind of magazine</p> <p>2 was it?</p> <p>3 A. A women's fashion magazine.</p> <p>4 Q. And what was your job there?</p> <p>5 A. I was an editorial assistant to</p> <p>6 the features department.</p> <p>7 Q. And what type features would that</p> <p>8 magazine write?</p> <p>9 A. Features that -- the audience of</p> <p>10 Marie Claire is women, so the features</p> <p>11 might be about a celebrity who's on the</p> <p>12 cover of the magazine or it might be about</p> <p>13 a relationship issue or it might be about</p> <p>14 -- about motherhood or it might be about a</p> <p>15 specific law or international issue that</p> <p>16 pertains to women.</p> <p>17 Q. Okay. Were any of the articles</p> <p>18 that you were involved with involve sexual</p> <p>19 assault or rape?</p> <p>20 A. Yes.</p> <p>21 Q. And can you tell me the title of</p> <p>22 that article?</p> <p>23 MS. STROM: Objection.</p>	<p style="text-align: right;">Page 36</p> <p>1 You can answer.</p> <p>2 A. I can't remember the titles of any</p> <p>3 articles. I just -- I do recall that</p> <p>4 gender violence was an issue that mattered</p> <p>5 to the magazine.</p> <p>6 So, for instance, if there was a</p> <p>7 story about -- I can remember one story</p> <p>8 was about the UN trying to stop women from</p> <p>9 being raped and sex trafficked, so that's</p> <p>10 the type of article.</p> <p>11 Q. (By Mr. Cockrell) Okay. Did you</p> <p>12 participate --</p> <p>13 A. But I don't remember the name.</p> <p>14 Q. Did you participate in writing any</p> <p>15 of those articles?</p> <p>16 A. As an editorial assistant, my job</p> <p>17 was to write captions for the most part</p> <p>18 and to get coffee and to pitch articles</p> <p>19 for other people to write.</p> <p>20 Q. Okay. And what's involved in</p> <p>21 writing a caption?</p> <p>22 A. Writing a caption is figuring out</p> <p>23 what is in the picture or what a story is</p>

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<p>1 about, if it's a caption in the table of</p> <p>2 contents, which is the page at the</p> <p>3 beginning of the magazine that says what's</p> <p>4 in the magazine, and then coming up with a</p> <p>5 correct way to describe it but also coming</p> <p>6 up with a pun about, for instance, a shoe</p> <p>7 that had a feather on it and saying birds</p> <p>8 of a feather wear this shoe together.</p> <p>9 Q. That's cute. Okay.</p> <p>10 What kind of captions would you</p> <p>11 have come up with on the sexual assault or</p> <p>12 rape stories that you were involved?</p> <p>13 A. Sorry. To clarify, I wouldn't</p> <p>14 have worked on a caption -- so there's</p> <p>15 many different types of stories that the</p> <p>16 magazine was doing at one time.</p> <p>17 I was the -- as an editorial</p> <p>18 assistant I would work on, for instance,</p> <p>19 writing captions on a fashion story or the</p> <p>20 table of contents.</p> <p>21 My job was usually to field</p> <p>22 pitches for other types of -- for a more</p> <p>23 -- let's say a more serious news story.</p>	<p>1 For the most part my job was to</p> <p>2 help other editors get those assigned. I</p> <p>3 also occasionally would write short -- so</p> <p>4 I would write occasionally short articles</p> <p>5 for the news section that might be, for</p> <p>6 instance, a 100-word blurb that was about</p> <p>7 a young woman who was doing something</p> <p>8 great.</p> <p>9 So, for instance, a young woman</p> <p>10 who started a charity and the goal would</p> <p>11 be to do a little interview of the girl to</p> <p>12 sort of inspire other women to help people</p> <p>13 or to do something cool.</p> <p>14 Q. Did you do any of that on any</p> <p>15 story that involved sexual assault or rape</p> <p>16 while you were there?</p> <p>17 A. I think it is completely possible</p> <p>18 that I interviewed someone, for instance,</p> <p>19 about sex trafficking or about gender</p> <p>20 violence.</p> <p>21 I do remember when I was there I</p> <p>22 interviewed this woman, Ai-jen Poo, who is</p> <p>23 the head of the National Domestic Workers</p>
Page 39	Page 40
<p>1 Alliance, and she wrote -- and it was</p> <p>2 interviewing her about ways to prevent</p> <p>3 sexual violence and also physical violence</p> <p>4 and economic abuse of women who are</p> <p>5 domestic aides, so women who are like a</p> <p>6 nannie or a maid, so that's an example of</p> <p>7 that type. That's one I can remember</p> <p>8 specifically.</p> <p>9 Q. Were there others other than that</p> <p>10 one, that one story?</p> <p>11 A. I don't remember.</p> <p>12 Q. And you don't remember the title</p> <p>13 of that story?</p> <p>14 A. I don't remember.</p> <p>15 Q. Okay. What year --</p> <p>16 A. I can spell the name of the woman,</p> <p>17 if it would be helpful.</p> <p>18 Q. Okay. Yeah, that would be</p> <p>19 helpful. I'm a bad speller. Go ahead.</p> <p>20 A. Sure. It's A-I, space, j-e-n,</p> <p>21 hyphen, P-o-o.</p> <p>22 Q. And where was she located?</p> <p>23 A. I don't remember. We did the</p>	<p>1 interview over the phone.</p> <p>2 Q. Okay. All right.</p> <p>3 And do you remember what year that</p> <p>4 was?</p> <p>5 A. 2013 or 2014 probably. I believe</p> <p>6 I was at Marie Claire Magazine until</p> <p>7 February 2015, but forgive me, I may be</p> <p>8 misremembering the exact date.</p> <p>9 Q. So how long were you at Marie</p> <p>10 Claire Magazine?</p> <p>11 A. Approximately two years is what I</p> <p>12 recall.</p> <p>13 Q. And tell me every position you</p> <p>14 held while you were there starting at the</p> <p>15 earliest from the time you left?</p> <p>16 A. Yes. I was an editorial assistant</p> <p>17 and that was my position throughout.</p> <p>18 In my time there my title didn't</p> <p>19 change to my best recollection, but I did</p> <p>20 start -- I took on more responsibilities</p> <p>21 over the time I was there.</p> <p>22 Q. Okay. All right.</p> <p>23 And let's see, what was your</p>

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<p>1 reason for leaving there?</p> <p>2 A. Because it was time to move up in</p> <p>3 my career.</p> <p>4 Q. Okay. And what was the next --</p> <p>5 I'm sorry, go ahead. I don't want to cut</p> <p>6 you off.</p> <p>7 A. I'm sorry, I said it was unstable.</p> <p>8 Can you hear me okay?</p> <p>9 Q. Yeah, I can now.</p> <p>10 A. It seems fine now.</p> <p>11 Q. Yeah.</p> <p>12 A. Okay, great. The next job was I</p> <p>13 was a features editor at BuzzFeed -- I</p> <p>14 mean -- sorry, correction, I believe my</p> <p>15 title was associate features editor at</p> <p>16 BuzzFeed.</p> <p>17 Q. And what's the job</p> <p>18 responsibilities for associate -- what did</p> <p>19 you say? Say it again, associate editor?</p> <p>20 A. Associate features editor.</p> <p>21 Q. Features editor.</p> <p>22 A. My job was -- my job was to assign</p> <p>23 and edit stories that were feature</p>	<p>1 stories, so stories in the thousands of</p> <p>2 words long. Yeah, that's the job, to</p> <p>3 assign and edit the stories.</p> <p>4 Q. What year did you start with</p> <p>5 BuzzFeed?</p> <p>6 A. I believe I started in</p> <p>7 February 2015.</p> <p>8 Q. Okay.</p> <p>9 A. But I don't have my résumé in</p> <p>10 front of me. I apologize.</p> <p>11 Q. All right. So at the time of the</p> <p>12 subject story, the Rondini story, was that</p> <p>13 your title?</p> <p>14 A. I believe at time of the Rondini</p> <p>15 story my title was deputy national editor</p> <p>16 at BuzzFeed.</p> <p>17 Q. Okay. Did you have -- in between</p> <p>18 the time you started did you have another</p> <p>19 position at BuzzFeed before you got that</p> <p>20 position?</p> <p>21 A. I was promoted from associate</p> <p>22 features editor to features editor in</p> <p>23 between those two titles.</p>
Page 43	Page 44
<p>1 Q. Okay. And what's involved in</p> <p>2 being a features editor?</p> <p>3 A. I would say it's the same, it's</p> <p>4 the same as the associate features editor.</p> <p>5 You assign and edit and work with writers</p> <p>6 on feature stories.</p> <p>7 I would say the difference between</p> <p>8 the two jobs is just length of experience.</p> <p>9 Q. Okay. So, basically, the same,</p> <p>10 just more experienced at it; is that what</p> <p>11 you're saying to me?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And how long were you a</p> <p>14 features editor?</p> <p>15 A. I don't remember the exact amount</p> <p>16 of time.</p> <p>17 Q. Okay. And so when you became a</p> <p>18 deputy features editor -- did I say that</p> <p>19 right?</p> <p>20 A. Well, then I became the deputy</p> <p>21 national editor, so I became a member of</p> <p>22 the national desk at BuzzFeed.</p> <p>23 Q. And what does that mean, the</p>	<p>1 national desk at BuzzFeed?</p> <p>2 A. It does features and enterprise</p> <p>3 reporting stories on big news topics of</p> <p>4 the day.</p> <p>5 So it's very similar to -- so, for</p> <p>6 instance, in my role as a features editor,</p> <p>7 I would work on stories that were -- that</p> <p>8 qualified as the same thing as the</p> <p>9 national desk, but I would also do say a</p> <p>10 celebrity profile.</p> <p>11 The national desk is all</p> <p>12 reporting, all serious reporting, so you</p> <p>13 wouldn't, for instance, see a celebrity</p> <p>14 profile on the national desk.</p> <p>15 Q. And who all was on the national</p> <p>16 desk while you were there at BuzzFeed?</p> <p>17 A. The national editor was Tina</p> <p>18 Susman, Katie Baker was a reporter, and</p> <p>19 then there were a number of other</p> <p>20 reporters in the years that I was in that</p> <p>21 job. Would you like me to name all of</p> <p>22 those reporters?</p> <p>23 Q. I tell you just leading up to the</p>

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<p style="text-align: right;">Page 45</p> <p>1 Rondini story if you could.</p> <p>2 MS. STROM: Objection.</p> <p>3 But you can answer.</p> <p>4 A. I probably have an easier time</p> <p>5 answering who in the years that I was in</p> <p>6 that job all who the reporters were.</p> <p>7 I don't want to miss someone or</p> <p>8 misattribute the timeline of them being on</p> <p>9 the desk.</p> <p>10 Q. (By Mr. Cockrell) Well, if you</p> <p>11 think it was during that time period, you</p> <p>12 can tell me, how about that? If you think</p> <p>13 it wasn't, you don't have to tell me.</p> <p>14 MS. STROM: Objection.</p> <p>15 But you can answer, Marisa,</p> <p>16 if you can.</p> <p>17 A. I know that Katie Baker was a</p> <p>18 reporter at the time. And I believe</p> <p>19 Albert Samaha, Hannah Allam, and I know</p> <p>20 there were other -- and Jessica Testa.</p> <p>21 I know there were other reporters</p> <p>22 but I think at this point I don't want to</p> <p>23 misattribute timelines of people working</p>	<p style="text-align: right;">Page 46</p> <p>1 on the desk.</p> <p>2 Q. (By Mr. Cockrell) Okay. That's</p> <p>3 the best of your recollection?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. At the time of the Rondini</p> <p>6 case you were a deputy features editor; is</p> <p>7 that correct?</p> <p>8 MS. STROM: Objection. I</p> <p>9 don't know what you mean by Rondini case.</p> <p>10 Q. (By Mr. Cockrell) Rondini article,</p> <p>11 excuse me.</p> <p>12 A. At the time of the -- at the time</p> <p>13 that Katie started reporting the article</p> <p>14 and throughout I was the deputy national</p> <p>15 editor at BuzzFeed.</p> <p>16 Q. And I want you to tell me your job</p> <p>17 responsibilities during that time.</p> <p>18 A. Sure. My job is to review pitches</p> <p>19 and ideas for articles. My job is to edit</p> <p>20 articles, and my job is to work with our</p> <p>21 team, including the reporters and the</p> <p>22 national editor, to fairly and accurately</p> <p>23 report out and put together those stories</p>
<p style="text-align: right;">Page 47</p> <p>1 for the BuzzFeed reader.</p> <p>2 Q. Okay. All right.</p> <p>3 Now, after BuzzFeed did you get</p> <p>4 any more promotions, after the BuzzFeed</p> <p>5 article on Rondini?</p> <p>6 A. Can you clarify? Are you asking</p> <p>7 if I was promoted because of the article</p> <p>8 or if I was promoted at any time during</p> <p>9 the rest of my tenure?</p> <p>10 Q. I was just asking if you were</p> <p>11 promoted during rest of the time of your</p> <p>12 tenure.</p> <p>13 A. No, the rest -- I remained -- I</p> <p>14 would have received financial raises, but</p> <p>15 my title stayed the same.</p> <p>16 Q. Okay. All right.</p> <p>17 Did you get a raise after the</p> <p>18 Rondini article?</p> <p>19 A. I know that I would get annual</p> <p>20 cost of living increases.</p> <p>21 Q. Okay.</p> <p>22 A. But I can't remember specifically,</p> <p>23 sorry.</p>	<p style="text-align: right;">Page 48</p> <p>1 Q. Do y'all get bonuses for</p> <p>2 particular stories?</p> <p>3 A. No, we do not.</p> <p>4 Q. Does a reporter get bonuses for</p> <p>5 different stories?</p> <p>6 A. No, reporters do not.</p> <p>7 Q. Are reporters paid a salary?</p> <p>8 A. Yes, reporters are paid a salary.</p> <p>9 Q. Do you know whether or not Katie</p> <p>10 Baker got any kind of promotion after the</p> <p>11 Rondini article?</p> <p>12 A. No, I do not.</p> <p>13 Q. Do you know if she got a raise</p> <p>14 after that Rondini article?</p> <p>15 A. No, I do not.</p> <p>16 Q. I'm going to take a second and see</p> <p>17 if I can get rid of some of these</p> <p>18 questions I think you've already answered.</p> <p>19 Did BuzzFeed send you to any media</p> <p>20 law training courses or seminars?</p> <p>21 MS. STROM: Objection. I</p> <p>22 believe she's answered, but you can</p> <p>23 answer.</p>

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<p>1 A. Yeah, the media law training at --</p> <p>2 the annual training that BuzzFeed would do</p> <p>3 with the PowerPoint from earlier.</p> <p>4 Q. (By Mr. Cockrell) Did they ever</p> <p>5 send you outside of BuzzFeed for any</p> <p>6 training or seminars?</p> <p>7 A. I'm trying to remember the name of</p> <p>8 it, so I'm going to say I don't remember</p> <p>9 because I'm having trouble remembering the</p> <p>10 name, unless you'd rather I could give a</p> <p>11 more general description.</p> <p>12 Q. You can do that to start with and</p> <p>13 we'll see the best you can remember.</p> <p>14 A. I know that I went to a -- I was</p> <p>15 sent to a training in 2018.</p> <p>16 Q. And do you remember where that</p> <p>17 training took place?</p> <p>18 A. I believe it took place in the</p> <p>19 Chelsea neighborhood of Manhattan, but I</p> <p>20 do not recall what the name of the</p> <p>21 building was, but it was with a journalism</p> <p>22 group.</p> <p>23 Q. Do you recall who the journalism</p>	<p>1 group was at the time that taught it?</p> <p>2 A. I don't.</p> <p>3 Q. Did they provide written material</p> <p>4 to that seminar?</p> <p>5 A. That seminar I do remember that</p> <p>6 there was written material.</p> <p>7 Q. And what were the subjects taught</p> <p>8 at that particular seminar?</p> <p>9 A. Holistic journalism questions and</p> <p>10 how to be a better journalist.</p> <p>11 Q. Did any of that deal with media</p> <p>12 law, anything that was taught?</p> <p>13 A. From my recollection, it did, but</p> <p>14 I can't -- I don't have those materials</p> <p>15 still.</p> <p>16 Q. And you don't remember the name of</p> <p>17 the company?</p> <p>18 A. No.</p> <p>19 Q. How many days seminar was this</p> <p>20 seminar --</p> <p>21 A. Two days.</p> <p>22 Q. Eight-hour days?</p> <p>23 A. -- is my recollection --</p>
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<p>1 Q. I'm sorry, I missed that. It kind</p> <p>2 of got garbled there.</p> <p>3 A. I'm sorry. I remember it being</p> <p>4 two days and full days long where they</p> <p>5 would provide say bagels for breakfast and</p> <p>6 sandwiches for lunch.</p> <p>7 Q. Did Katie attend that seminar as</p> <p>8 well? Do you know Katie Baker?</p> <p>9 A. No, this was for editors.</p> <p>10 Q. I'm sorry --</p> <p>11 A. She wouldn't have attended --</p> <p>12 sorry, it was for editors so I would have</p> <p>13 attended for editors.</p> <p>14 Q. Do you recall what other editors</p> <p>15 went with you from BuzzFeed?</p> <p>16 A. I remember that I was the person</p> <p>17 selected for that time to go from the news</p> <p>18 room, so it was me only.</p> <p>19 Q. Okay.</p> <p>20 A. They would pick different people</p> <p>21 to go.</p> <p>22 Q. Did they -- is this the only</p> <p>23 seminar outside of BuzzFeed that you were</p>	<p>1 sent to?</p> <p>2 A. I can't recall.</p> <p>3 Q. Were they all in New York City or</p> <p>4 New York City area?</p> <p>5 A. Yes.</p> <p>6 Q. Do you remember any of the</p> <p>7 instructors?</p> <p>8 A. No.</p> <p>9 Q. And pardon my ignorance, but when</p> <p>10 you say holistic journalism, define that</p> <p>11 for me.</p> <p>12 A. My recollection is that it covered</p> <p>13 everything from questions that people</p> <p>14 would run into while reporting.</p> <p>15 COURT REPORTER: What kind</p> <p>16 of questions?</p> <p>17 MR. COCKRELL: The court</p> <p>18 reporter missed that last part.</p> <p>19 COURT REPORTER: What kind</p> <p>20 of questions?</p> <p>21 THE WITNESS: Questions that</p> <p>22 people would run into while reporting or</p> <p>23 editing stories.</p>

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<p>1 Q. (By Mr. Cockrell) Can you give me 2 an example of that? 3 A. I can't. 4 Q. And I believe you said it covered 5 media ethics as well; is that correct? 6 A. I can't really remember exactly 7 what was covered. I just remember that 8 this was one of a couple day seminar I 9 went to in 2018. 10 Q. Thank you. 11 A. And I can tell you we didn't cover 12 it, but I could tell you about another 13 seminar -- since you brought up other 14 seminars that I went to when I was at 15 Marie Claire Magazine. Is that helpful? 16 Q. Yes, go ahead. Tell me. 17 A. I went to a multi-day seminar for 18 the American Society of Magazine Editors 19 -- or American Society of Magazine 20 Excellence, it's called ASME, is the 21 organization and that was a seminar where 22 the editors of major publications would 23 come and do sessions where they talked</p>	<p>1 about stories that they specifically 2 worked on and trouble-shooting and they 3 also would answer questions. 4 Q. Do you recall if any of it dealt 5 with rape or sexual assault? 6 A. I don't recall. 7 Q. What about media ethics? 8 A. I believe that was part of it. 9 Q. Do you remember any details about 10 the media ethics that was taught? 11 A. I don't recall specifically. 12 Q. What year would this have been? 13 A. To my best recollection, it would 14 have been in 2014. 15 Q. Do you recall who the instructors 16 were? 17 A. I remember that they included 18 David Granger, the editor-in-chief of 19 Esquire Magazine and other prominent 20 magazine editors, and it would have been 21 hosted, to the best of my recollection by 22 Sid Holt who is the head of the ASME 23 group, the ASME group.</p>
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<p>1 Q. Again, what year was that? 2 A. I believe 2014. 3 Q. And was that -- it was in New York 4 City, but do you recall where it was held 5 at? 6 A. I don't. 7 Q. Any other seminars that you can 8 think of? 9 A. Not that I can think of with 10 specificity, so no, not that I recall. 11 Q. What about conferences? Did you 12 attend any conferences while you were at 13 BuzzFeed? And I'm interested up to the 14 date the article was published. 15 A. Not that I recall with 16 specificity. 17 Q. What about while you were at the 18 other magazines? Did you attend any 19 conferences with any of those? 20 A. Not that I recall beyond what I've 21 already shared. 22 Q. All right. 23 Have you ever taken any classes or</p>	<p>1 attended any seminars with regard to 2 interviewing techniques? 3 MS. STROM: Objection. I 4 believe asked and answered on all 5 seminars. 6 But go ahead, Marisa, if you 7 can. 8 Q. (By Mr. Cockrell) I don't think I 9 asked about interviewing techniques. 10 A. In my experience that I've never 11 attended seminars about interviewing 12 techniques. 13 In my experience in the industry 14 usually these seminars deal with a bunch 15 of different topics at once, so I can't 16 remember a -- so the answer is no, I never 17 attended -- to the best of my knowledge a 18 conference specifically about or seminar 19 specifically about interviewing 20 techniques. 21 Q. Okay. In any of your educational 22 background did you ever attend any classes 23 or anything to do with interviewing</p>

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Page 57	Page 58
<p>1 techniques?</p> <p>2 A. What would be part of anything</p> <p>3 when you say classes or anything?</p> <p>4 Q. I guess classes in college,</p> <p>5 Fordham.</p> <p>6 A. Do you mean a class that was</p> <p>7 called interviewing techniques?</p> <p>8 Q. Yes, or related --</p> <p>9 A. No.</p> <p>10 Q. -- or related thereto.</p> <p>11 A. Because interviewing techniques</p> <p>12 are so central to journalism, I found that</p> <p>13 it comes up in pretty much any</p> <p>14 conversation.</p> <p>15 But as I said before, I didn't</p> <p>16 study journalism in college. I practiced</p> <p>17 outside and I learned outside of the</p> <p>18 classroom through internships, which is</p> <p>19 often how people learn journalism</p> <p>20 techniques.</p> <p>21 Q. Did they have any teaching program</p> <p>22 or any kind of class or seminar to be able</p> <p>23 to write for the school newspaper at</p>	<p>1 Fordham?</p> <p>2 A. To the best of my recollection at</p> <p>3 Fordham, you didn't take a class to do the</p> <p>4 school newspaper.</p> <p>5 The philosophy is that the school</p> <p>6 newspaper you are out there, you're doing</p> <p>7 interviews, and that's how you're learning</p> <p>8 to do that job.</p> <p>9 Q. Would you say on-the-job training</p> <p>10 as opposed to any type formal training</p> <p>11 classes or anything like that; is that</p> <p>12 what you're telling me?</p> <p>13 A. The student newspaper is seen in</p> <p>14 journalism as on-the-job -- straight</p> <p>15 on-the-job training.</p> <p>16 Q. All right. What was the name of</p> <p>17 the school newspaper at Fordham?</p> <p>18 A. It was called The Paper.</p> <p>19 Q. That's good name. Is that still</p> <p>20 the name?</p> <p>21 A. I couldn't tell you. Sorry.</p> <p>22 Q. Who was the editor of that paper?</p> <p>23 A. When? At the beginning of my</p>
Page 59	Page 60
<p>1 tenure it was Kate Murphy, and then by the</p> <p>2 end it was me.</p> <p>3 Q. And how many years did you write</p> <p>4 for the school newspaper?</p> <p>5 A. I believe I was on the school</p> <p>6 newspaper the whole time I was at Fordham,</p> <p>7 from the time I was a freshman to the time</p> <p>8 I was a senior.</p> <p>9 But they don't have second</p> <p>10 semester seniors. You retire from being</p> <p>11 the editor-in-chief your second semester</p> <p>12 so that the younger person can take over.</p> <p>13 Q. Okay. Did they have any kind of</p> <p>14 training to become the editor of the paper</p> <p>15 other than on the job? Any seminars or</p> <p>16 teaching of any kind?</p> <p>17 A. The teaching happened from</p> <p>18 journalist to journalist. In that time,</p> <p>19 for instance, part of what made we qualify</p> <p>20 to be the editor-in-chief of the school</p> <p>21 newspaper was that I had done internships</p> <p>22 as a learning experience in addition to</p> <p>23 reporting stories.</p>	<p>1 Q. Okay. I may have asked this,</p> <p>2 forgive me if I did, but how many stories</p> <p>3 do you think you wrote for the school</p> <p>4 newspaper?</p> <p>5 A. I couldn't remember. Before you</p> <p>6 asked me if it was more than ten, and it</p> <p>7 was definitely more than ten.</p> <p>8 Q. More than 20?</p> <p>9 A. I believe it was more than 20.</p> <p>10 Q. More than 50?</p> <p>11 A. I believe it was more than 50.</p> <p>12 Q. More than 100?</p> <p>13 A. I believe it was more than 100.</p> <p>14 Q. Okay. I'm going to stop at that.</p> <p>15 You wrote a lot of stories for them;</p> <p>16 right? All right.</p> <p>17 A. Yes, it was my activity. It was</p> <p>18 my passion. It was -- I spent a lot of</p> <p>19 time on the school newspaper in college.</p> <p>20 Q. Were they all published, these</p> <p>21 stories?</p> <p>22 A. I can't recall.</p> <p>23 Q. Do you recall any that refused to</p>

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<p>1 be published?</p> <p>2 A. No.</p> <p>3 MS. STROM: Objection.</p> <p>4 Go ahead, Marisa.</p> <p>5 Q. (By Mr. Cockrell) No? Is that</p> <p>6 what I heard?</p> <p>7 A. I don't recall any that were</p> <p>8 refused to be published.</p> <p>9 Q. Okay. Were any of them with</p> <p>10 regard to sexual assault or rape, any of</p> <p>11 these stories?</p> <p>12 A. I believe that some were.</p> <p>13 Q. So that would be the main topic of</p> <p>14 those particular articles, sexual assault</p> <p>15 or rape?</p> <p>16 A. I believe they were -- they would</p> <p>17 have been similar to what I was describing</p> <p>18 the articles for the Marie Claire</p> <p>19 Magazine, so say an interview with someone</p> <p>20 who was trying to change a policy or</p> <p>21 someone who was, for instance -- a story</p> <p>22 that would have been about it is, for</p> <p>23 instance, a review of writing about a Lady</p>	<p>1 Gaga song that was about sexual abuse, so</p> <p>2 for instance, if there was something in</p> <p>3 culture that came up that involved sexual</p> <p>4 violence, we would have covered it on the</p> <p>5 school newspaper because we cover, for</p> <p>6 instance, Lady Gaga.</p> <p>7 Q. Do you recall covering any rape on</p> <p>8 campus or sexual assault on campus stories</p> <p>9 while you were at Fordham?</p> <p>10 A. I do.</p> <p>11 Q. Tell me about that, that story.</p> <p>12 A. I believe that we covered stories</p> <p>13 that were about a rape on campus, for</p> <p>14 instance, a student group would try to</p> <p>15 change a policy regarding a rape on campus</p> <p>16 or regarding how the administration had</p> <p>17 responded to rape allegation because they</p> <p>18 were covering issues that were going on on</p> <p>19 campus, so whether it was about a pop star</p> <p>20 who people were really invested in or</p> <p>21 whether it was about a specific policy</p> <p>22 that a student group was pushing for, that</p> <p>23 would all be of interest to college</p>
Page 63	Page 64
<p>1 students on campus so we would cover those</p> <p>2 issues.</p> <p>3 Q. Okay. Do you remember a</p> <p>4 particular case, a particular rape or a</p> <p>5 particular sexual assault case that you</p> <p>6 covered on an individual student or</p> <p>7 anything like that?</p> <p>8 A. No, I don't.</p> <p>9 Q. Would it mostly have been about</p> <p>10 policy, changing the policy with regard to</p> <p>11 sexual assault or rape?</p> <p>12 A. I wouldn't say about changing</p> <p>13 policy, but I would say it was about</p> <p>14 issues that were of the public interest to</p> <p>15 students, so if a student group was trying</p> <p>16 to change a policy, we would cover this</p> <p>17 group is trying to change a policy would</p> <p>18 be the headline and we would write a story</p> <p>19 about that.</p> <p>20 Q. Okay. Do you remember any</p> <p>21 particular one where --</p> <p>22 A. I don't.</p> <p>23 Q. -- a student group was trying to</p>	<p>1 change the policy regarding rape or sexual</p> <p>2 assault?</p> <p>3 A. I do not.</p> <p>4 Q. Who was your immediate supervisor</p> <p>5 at BuzzFeed when the article Rondini</p> <p>6 article was published?</p> <p>7 A. Tina Susman.</p> <p>8 Q. And what was her title?</p> <p>9 MS. STROM: Objection, asked</p> <p>10 and answered.</p> <p>11 But you can answer again,</p> <p>12 Marisa.</p> <p>13 Q. (By Mr. Cockrell) Pardon my</p> <p>14 memory. Appreciate it, go ahead.</p> <p>15 A. National editor or national desk</p> <p>16 editor.</p> <p>17 Q. And do you know what her job</p> <p>18 responsibilities were as national desk</p> <p>19 editor?</p> <p>20 A. I know that one of her</p> <p>21 responsibilities was being my boss. I</p> <p>22 think you would have to ask her about what</p> <p>23 her actual responsibilities were.</p>

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<p>1 Q. You reported to her; is that 2 correct? 3 A. That is correct. 4 Q. Did you report to anybody else? 5 A. She was my immediate supervisor so 6 I would report to her. She was my 7 manager. 8 Q. What was -- at the time the 9 article was published, the Rondini 10 article, what was the hierarchy from an 11 organizational standpoint at BuzzFeed? 12 MS. STROM: Objection. You 13 mean organizational for the whole company? 14 MR. COCKRELL: Yeah. 15 A. I believe at the time Jonah 16 Peretti was the CEO and founder, I believe 17 is his title at BuzzFeed. 18 Ben Smith was the head of the 19 newsroom as editor-in-chief of the 20 newsroom at BuzzFeed. 21 And then in my corner of things 22 Tina Susman was the national desk editor 23 and I reported to her, but there were many</p>	<p>1 other people in the org chart at BuzzFeed 2 but those were the main -- if you look at 3 where I am on the tree. 4 Q. I got you. That's what I was 5 asking primarily. What about for 6 reporters? What's the hierarchy in 7 reporters like Katie Baker? 8 A. To my recollection, Tina Susman 9 was Katie Baker's manager and supervisor 10 as well. 11 Q. So Tina would supervise all 12 reporters or just Katie? 13 A. Tina -- you would have to confirm 14 with Tina, but she would supervise the 15 reporters who she managed on our team, but 16 there were many, you know, maybe over 100 17 reporters in the news room. She would 18 supervise specifically the people on our 19 team. 20 Q. And the team, say what it was 21 called again, the team? 22 A. The national desk. 23 Q. Have you told me everybody that's</p>
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<p>1 on the national desk team? 2 A. I told you everybody who I recall 3 being on the team at the time with the 4 note that I know the team was bigger than 5 I described, I just don't want to give the 6 wrong names to dates. 7 Q. There would be a lot more people 8 than what we've talked about on the 9 national desk? 10 A. I believe there would be maybe six 11 people. 12 Q. Six people, okay. 13 A. But I can't remember specifically. 14 Q. Okay, that's fine. 15 Is Tina still with BuzzFeed, do 16 you know? 17 A. No, she is not with BuzzFeed. 18 Q. Where is Tina now, if you know? 19 A. I believe Tina works at Time 20 Magazine. 21 Q. Doesn't Katie Baker's husband have 22 something to do with Time Magazine? 23 MS. STROM: Objection.</p>	<p>1 But go ahead, Marisa. 2 A. Katie Baker's -- 3 Q. (By Mr. Cockrell) Husband? 4 A. Works at the New York Times 5 Newspaper. 6 Q. Okay, I got it wrong. 7 Which is different than Time 8 Magazine; right? 9 A. Correct. 10 Q. Do you know what he does at the 11 New York Times? 12 A. I do not. 13 Q. Okay. I think I know the answer 14 to this question already but I've got to 15 ask, you know. 16 Have you ever been fired from a 17 job or asked to resign? 18 A. I have never been fired from a job 19 or asked to resign. 20 Q. As I suspected. 21 Have you ever been accused of 22 getting something wrong by an employer? 23 MS. STROM: Objection.</p>

17 (Pages 65 to 68)

<p style="text-align: right;">Page 69</p> <p>1 You can answer, Marisa.</p> <p>2 A. Would it be possible for you to be</p> <p>3 more specific?</p> <p>4 Q. (By Mr. Cockrell) I will try.</p> <p>5 Have you ever been accused of getting</p> <p>6 something wrong, let's say in editing a</p> <p>7 story, by an employer?</p> <p>8 A. No.</p> <p>9 Q. How about reporting a story?</p> <p>10 MS. STROM: Objection.</p> <p>11 What about how about</p> <p>12 reporting a story?</p> <p>13 Q. (By Mr. Cockrell) Have you ever</p> <p>14 been accused of getting something wrong in</p> <p>15 a story by an employer?</p> <p>16 A. No.</p> <p>17 Q. You seem to hesitate a little bit.</p> <p>18 Something you think maybe?</p> <p>19 MS. STROM: Objection. I</p> <p>20 don't believe she hesitated at all, but go</p> <p>21 ahead, Marisa.</p> <p>22 Q. (By Mr. Cockrell) Could be the</p> <p>23 computer.</p>	<p style="text-align: right;">Page 70</p> <p>1 A. I guess I don't understand what</p> <p>2 you mean by accused by an employer.</p> <p>3 Newspapers and magazines run</p> <p>4 corrections on stories, if something is</p> <p>5 provably incorrect, and that's why that</p> <p>6 mechanism exists but --</p> <p>7 Q. Have you ever -- I'm sorry, I</p> <p>8 didn't mean to interrupt you.</p> <p>9 A. That's why I'm confused.</p> <p>10 Q. Okay. I guess that's probably a</p> <p>11 good word then. I'll use it.</p> <p>12 Have any of your stories that</p> <p>13 you've edited had to be corrected, run as</p> <p>14 a correction?</p> <p>15 A. Very rarely stories I've worked on</p> <p>16 have had corrections amended to them.</p> <p>17 Q. But there have been some?</p> <p>18 A. Yes, for instance, if you say</p> <p>19 someone has blue eyes but their eyes are</p> <p>20 green, the reason that we have corrections</p> <p>21 is so we can change a story and then</p> <p>22 reveal to the reader hey, we got it wrong,</p> <p>23 we said his eyes were blue when they were</p>
<p style="text-align: right;">Page 71</p> <p>1 green, so it's for transparency and we</p> <p>2 carefully review those to decide because</p> <p>3 we want to convey the right information in</p> <p>4 print.</p> <p>5 Q. So when something is -- a</p> <p>6 correction is run is that re-published?</p> <p>7 MS. STROM: Objection, as to</p> <p>8 re-published.</p> <p>9 Q. (By Mr. Cockrell) To the public?</p> <p>10 A. Correct. What I'm describing is</p> <p>11 that if someone identifies something</p> <p>12 incorrect in a story, we update that story</p> <p>13 so that it's clear to the public not only</p> <p>14 that the correct information is out there,</p> <p>15 but also so that the public knows hey, we</p> <p>16 got it wrong.</p> <p>17 And it will say at the bottom of</p> <p>18 the story that's why we, you know, we said</p> <p>19 his eyes were blue, his eyes were green,</p> <p>20 the story now says his eyes are green.</p> <p>21 Q. Do you know of any articles that</p> <p>22 Katie Baker has written that had to be</p> <p>23 corrected and a correction run?</p>	<p style="text-align: right;">Page 72</p> <p>1 A. No, I do not.</p> <p>2 Q. Who decides that?</p> <p>3 A. The editor is the -- decides, and</p> <p>4 if there's a fact checker, they'll discuss</p> <p>5 with the fact checker and they'll discuss</p> <p>6 with the reporter, but ultimately it's up</p> <p>7 to the editor and most importantly to the</p> <p>8 editor who's the supervisor so say the</p> <p>9 desk editor.</p> <p>10 Q. In the Rondini article who would</p> <p>11 have made that decision if it had been</p> <p>12 made to correct it?</p> <p>13 A. The people I just described. So</p> <p>14 editor talking to fact checker and</p> <p>15 reporter.</p> <p>16 Q. Would that -- you were a deputy</p> <p>17 editor at the time. Would that have been</p> <p>18 you that would have made the decision?</p> <p>19 A. Sorry.</p> <p>20 Q. That would have made the decision.</p> <p>21 A. I was one of two editors, yes. It</p> <p>22 would be me and Tina.</p> <p>23 Q. Okay. Would Ben Smith have to do</p>

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<p>1 that as national editor?</p> <p>2 A. I don't know. You would have to</p> <p>3 ask Ben Smith how often he weighs in on</p> <p>4 questions like that.</p> <p>5 Q. Would there have been anybody</p> <p>6 between you and Tina and Ben Smith that</p> <p>7 would have made that decision?</p> <p>8 A. I believe it would have been me</p> <p>9 and Tina, Tina being the boss, and I don't</p> <p>10 know what her conversations were like with</p> <p>11 Ben Smith.</p> <p>12 Q. Okay. Did y'all have meetings</p> <p>13 ever to discuss articles?</p> <p>14 A. We had meetings to discuss</p> <p>15 articles all the time.</p> <p>16 Q. Did you have meetings to discuss</p> <p>17 the Rondini article prior to it being</p> <p>18 published?</p> <p>19 MS. STROM: Bob, if you're</p> <p>20 going to start getting into the Rondini</p> <p>21 article, if it's a new set of questions, I</p> <p>22 would love to take a break, but if you're</p> <p>23 wrapping up --</p>	<p>1 MR. COCKRELL: Yeah, I don't</p> <p>2 remember how long we've going, but yeah,</p> <p>3 it's fine to take a break.</p> <p>4 MS. STROM: About an hour</p> <p>5 and fifteen.</p> <p>6 MR. COCKRELL: Yeah, let's</p> <p>7 give her a break.</p> <p>8 VIDEOGRAPHER: We're off the</p> <p>9 record at 10:11 a.m.</p> <p>10 (Recess was taken.)</p> <p>11 VIDEOGRAPHER: We're back on</p> <p>12 the record at 10:23 a.m.</p> <p>13 Q. (By Mr. Cockrell) I tell you what,</p> <p>14 I'll get to BuzzFeed in just a minute.</p> <p>15 I'm going to ask you some kind of</p> <p>16 basic questions. I think I know the</p> <p>17 answer to this, too, but I'm going to ask</p> <p>18 anyway. Have you ever served in the</p> <p>19 military?</p> <p>20 A. No, I have not.</p> <p>21 Q. And have you ever been arrested or</p> <p>22 charged with a crime?</p> <p>23 A. No, I have not.</p>
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<p>1 Q. Have you or any company or</p> <p>2 business entity ever been sued for</p> <p>3 something that you were alleged to have</p> <p>4 done or not done?</p> <p>5 A. No, I have not.</p> <p>6 Q. Have you ever had to file a civil</p> <p>7 lawsuit?</p> <p>8 A. No, I have not.</p> <p>9 Q. Have you ever lived in the state</p> <p>10 of Alabama?</p> <p>11 A. No, I've never had the pleasure.</p> <p>12 Q. What about any of your family?</p> <p>13 A. Yes, my dad lived in Boaz, Alabama</p> <p>14 as a kid.</p> <p>15 Q. They used to have the best outlets</p> <p>16 up there, Boaz. How long has he been gone</p> <p>17 from Boaz?</p> <p>18 A. A long time.</p> <p>19 Q. Do you have any other relatives in</p> <p>20 the state of Alabama?</p> <p>21 A. I don't believe so.</p> <p>22 Q. Do you have any close personal</p> <p>23 friends in the state of Alabama?</p>	<p>1 A. I don't think so.</p> <p>2 Q. Does your husband have any</p> <p>3 relatives in the state of Alabama?</p> <p>4 MS. STROM: I think this is</p> <p>5 verging on completely irrelevant.</p> <p>6 MR. COCKRELL: Well, it's</p> <p>7 jury information. That's what I'm trying</p> <p>8 to get to. That's why I'm moving so fast.</p> <p>9 MS. STROM: Jury</p> <p>10 information?</p> <p>11 MR. COCKRELL: Potential</p> <p>12 relatives that might show up on a jury.</p> <p>13 MS. STROM: Okay. We can do</p> <p>14 this one and let's go to a different</p> <p>15 topic. I don't think we need to use jury</p> <p>16 information here --</p> <p>17 MR. COCKRELL: No, that's</p> <p>18 pretty standard, any deposition you take</p> <p>19 where you ask jury information, because</p> <p>20 you've got a right to know that, as far as</p> <p>21 who somebody's related to or kin to --</p> <p>22 MS. STROM: We can do</p> <p>23 Voir-Dire if we get to Voir-Dire --</p>

19 (Pages 73 to 76)

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<p style="text-align: right;">Page 77</p> <p>1 MR. COCKRELL: We're not 2 going to do that, but just asking really 3 family names is all I'm asking. 4 Q. You can answer the question. Does 5 your husband have any relatives in 6 Alabama, that live in the state of 7 Alabama? 8 A. Not to my knowledge. 9 Q. Does BuzzFeed to your knowledge 10 employ anybody that lives in the state of 11 Alabama? 12 A. I don't know. 13 Q. Did you know anybody that worked 14 for BuzzFeed that was from the state of 15 Alabama? 16 A. I don't recall. 17 Q. And I know you've never worked as 18 a law enforcement officer, but have you 19 had any training in law enforcement? 20 A. No. 21 Q. Have you ever attended a law 22 school or a paralegal school or worked in 23 a law office?</p>	<p style="text-align: right;">Page 78</p> <p>1 A. No, I have not. 2 Q. Have you ever used the Code of 3 Alabama to look up a rape law or sexual 4 assault law to determine elements required 5 to make an arrest for rape or sexual 6 assault? 7 A. At the time of reviewing this 8 article, I reviewed information about the 9 Alabama rape law as is described in the 10 piece. 11 Q. And what information was that you 12 reviewed? 13 A. Information about earnest 14 resistance and what the law was at the 15 time. 16 Q. And where did you get this 17 information? 18 A. I can't recall. 19 Q. Did you have to look it up or did 20 somebody provide it to you? 21 A. I can't recall. 22 Q. I'm not asking what was said, but 23 did you ever consult with a licensed</p>
<p style="text-align: right;">Page 79</p> <p>1 attorney about the law in the state of 2 Alabama? 3 A. You cut out for a second. Can you 4 repeat that question please? 5 Q. (By Mr. Cockrell) Sure. I'm not 6 asking what was said between you, but did 7 you ever consult with an attorney about 8 the Alabama law and the elements required 9 to make an arrest for rape or sexual 10 assault? 11 MS. STROM: Objection. That 12 would call for attorney-client information 13 since you're asking the content of their 14 conversation. 15 MR. COCKRELL: I'm not 16 asking the content. I'm just asking did 17 you ever ask that of an attorney. I'm not 18 asking what the attorney told you. 19 MS. STROM: Well, the 20 questions that are asked to an attorney 21 are privileged. 22 MR. COCKRELL: I'll tell you 23 what let's do, let's certify that question</p>	<p style="text-align: right;">Page 80</p> <p>1 and we'll move on and we'll decide whether 2 to take it up or not, but you don't 3 remember where you got your information 4 with regard to earnest resistance in 5 Alabama law? 6 MS. STROM: Objection to the 7 extent you can answer without divulging 8 attorney-client communications, you can 9 respond to that question. 10 A. I'm sorry, I just got a little 11 twisted up. Can you repeat the question? 12 MR. COCKRELL: Nancy, can 13 you read that back to her because I'll 14 probably screw it up myself? 15 (Whereupon, requested portion was 16 read back by court reporter.) 17 A. I remember having conversations 18 with the team working on the story at 19 BuzzFeed about earnest resistance. 20 Q. And who did you have those 21 discussions with? 22 A. That would have been with Tina 23 Susman, the editor. That would have been</p>

20 (Pages 77 to 80)

<p style="text-align: right;">Page 81</p> <p>1 with Katie Baker the reporter. That would</p> <p>2 have been with Sharmila, the fact checker,</p> <p>3 and that would have been with our in-house</p> <p>4 counsel.</p> <p>5 Q. Who is in-house counsel at that</p> <p>6 time?</p> <p>7 MS. STROM: Objection.</p> <p>8 Asked and answer.</p> <p>9 Q. (By Mr. Cockrell) Yeah, I think</p> <p>10 you did, but -- you know what, I think you</p> <p>11 did answer that already, but you can tell</p> <p>12 me anyway.</p> <p>13 A. I can add actually it was, there</p> <p>14 were two in-house lawyers and I only</p> <p>15 mentioned the first one before, so this</p> <p>16 would have been Matthew Schafer,</p> <p>17 S-c-h-a-f-e-r, in addition to Nabiha Syed.</p> <p>18 Q. Do you know if they were licensed</p> <p>19 to practice law in the state of Alabama?</p> <p>20 A. I couldn't say.</p> <p>21 Q. Did you ever actually look at the</p> <p>22 law in the Code of Alabama yourself to</p> <p>23 determine what it says about earnest</p>	<p style="text-align: right;">Page 82</p> <p>1 resistance in a rape case or any of the</p> <p>2 elements that it would take to arrest</p> <p>3 somebody for rape or sexual assault?</p> <p>4 A. I recall that I did.</p> <p>5 Q. Do you recall how you did it?</p> <p>6 Online or how you did it?</p> <p>7 A. Online. I would have reviewed it</p> <p>8 on my company-issued laptop.</p> <p>9 Q. And why did you look at that law</p> <p>10 online?</p> <p>11 A. Because I try to understand and my</p> <p>12 job is to work with reporters on their</p> <p>13 stories and as this case -- I mean as this</p> <p>14 story that we're talking about, the Megan</p> <p>15 Rondini story, as it referenced earnest</p> <p>16 resistance it was relevant for me to</p> <p>17 understand.</p> <p>18 Q. When you apply the law to the</p> <p>19 facts as conveyed by Megan Rondini, did</p> <p>20 you have any problem with the part that</p> <p>21 Alabama law required earnest resistance?</p> <p>22 MS. STROM: Objection. (A)</p> <p>23 I don't know how Megan Rondini could have</p>
<p style="text-align: right;">Page 83</p> <p>1 conveyed anything to her as she was</p> <p>2 deceased, and (B) I don't understand what</p> <p>3 you mean by problem.</p> <p>4 Q. (By Mr. Cockrell) Well, I'll</p> <p>5 clarify. Did you see a videotape of Megan</p> <p>6 Rondini's statement to the Homicide Unit</p> <p>7 in Tuscaloosa County?</p> <p>8 A. I watched video of Megan Rondini</p> <p>9 being interviewed.</p> <p>10 Q. Did you see the entire video?</p> <p>11 A. To the best of my recollection.</p> <p>12 Q. And where did you view this video</p> <p>13 at?</p> <p>14 A. Again, on my BuzzFeed-issued</p> <p>15 computer.</p> <p>16 Q. The article showed just clips of</p> <p>17 that interview. Did you see more than was</p> <p>18 just in the clips on the articles?</p> <p>19 A. Yes, I did.</p> <p>20 Q. And who showed those to you?</p> <p>21 A. I believe that I reviewed them</p> <p>22 myself.</p> <p>23 Q. And were they -- and where did you</p>	<p style="text-align: right;">Page 84</p> <p>1 get them?</p> <p>2 A. I can't recall.</p> <p>3 Q. After having reviewed that</p> <p>4 videotape of the statement of Megan</p> <p>5 Rondini, did -- how did you feel about</p> <p>6 whether or not the element of earnest</p> <p>7 resistance had been met?</p> <p>8 MS. STROM: Objection.</p> <p>9 You can answer, Marisa, if</p> <p>10 you can.</p> <p>11 A. I'm not a police officer in the</p> <p>12 state of Alabama so I couldn't have known,</p> <p>13 and I also more importantly wasn't in the</p> <p>14 room when whatever did or did not happen</p> <p>15 between those two folks happened, so since</p> <p>16 I wasn't there I couldn't know about</p> <p>17 whether earnest resistance was met.</p> <p>18 Q. (By Mr. Cockrell) Do Alabama</p> <p>19 police officers, investigators like Josh</p> <p>20 Hastings and Adam Jones, write the law in</p> <p>21 the state of Alabama and create the law?</p> <p>22 MS. STROM: Objection.</p> <p>23 You can answer.</p>

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<p>1 A. Not to my understanding.</p> <p>2 Q. (By Mr. Cockrell) I'm sorry, I</p> <p>3 couldn't hear your answer.</p> <p>4 A. Not to my understanding, no.</p> <p>5 Q. Did you ever express concern to</p> <p>6 Katie Baker about whether the Rondini case</p> <p>7 wouldn't meet the elements of earnest</p> <p>8 resistance under Alabama rape or sexual</p> <p>9 assault law?</p> <p>10 A. I believe the story describes that</p> <p>11 it did not.</p> <p>12 Q. And did you know that prior to the</p> <p>13 story being published?</p> <p>14 A. I understood as we published it in</p> <p>15 the story that it was said that she,</p> <p>16 quote, didn't resist or kick him, and</p> <p>17 therefore, it was interpreted that it</p> <p>18 didn't meet the standard by the officer.</p> <p>19 Q. Did Katie Baker know that it</p> <p>20 didn't meet the elements of the crime when</p> <p>21 she published the story?</p> <p>22 A. Katie -- I can't speak to what</p> <p>23 Katie knew, but I can say in the story it</p>	<p>1 says what it says in the story, so my</p> <p>2 personal understanding was what it says</p> <p>3 are the facts as they're laid out in the</p> <p>4 story. You would have to ask Katie what</p> <p>5 she thought at the time.</p> <p>6 Q. Can a police officer change facts</p> <p>7 to meet a crime --</p> <p>8 MS. STROM: Objection.</p> <p>9 Q. (By Mr. Cockrell) -- to meet the</p> <p>10 elements of a crime for rape or sexual</p> <p>11 assault?</p> <p>12 MS. STROM: Objection.</p> <p>13 A. I don't know if I understand.</p> <p>14 MR. COCKRELL: Can you read</p> <p>15 the question back?</p> <p>16 (Whereupon, requested portion was</p> <p>17 read back by court reporter.)</p> <p>18 A. I'm not a police officer. I've</p> <p>19 never been to officer school, and I just</p> <p>20 -- I don't really understand the question,</p> <p>21 but I can say that I've never been trained</p> <p>22 as a police officer.</p> <p>23 Q. Taking one of those little breaks</p>
Page 87	Page 88
<p>1 so I can shorten this deposition as much</p> <p>2 as possible. Hold on one second.</p> <p>3 When you were at BuzzFeed, did</p> <p>4 they ever provide you with written</p> <p>5 journalism ethics policy of any kind?</p> <p>6 MS. STROM: Objection, I</p> <p>7 believe this has been asked and answered.</p> <p>8 Q. (By Mr. Cockrell) Not quite the</p> <p>9 same way.</p> <p>10 Go ahead.</p> <p>11 A. As we discussed before, to my</p> <p>12 recollection there was a standard --</p> <p>13 ethics standards and practices that are</p> <p>14 publicly available online and distributed</p> <p>15 to employees like me.</p> <p>16 Q. Is that pretty common, having</p> <p>17 worked in journalism for a while now, at</p> <p>18 every place you worked?</p> <p>19 A. I haven't done enough of an audit</p> <p>20 I think of what various newsrooms do. I</p> <p>21 do know that many newsrooms do have those</p> <p>22 policies.</p> <p>23 Q. Like AP, Associated Press, would</p>	<p>1 they have it?</p> <p>2 A. Having never worked there, I don't</p> <p>3 know.</p> <p>4 Q. Okay. But the places you have</p> <p>5 worked did they have it? Did they have</p> <p>6 journalism ethics written manual?</p> <p>7 A. To my recollection, at places</p> <p>8 where I've worked have had some sort of</p> <p>9 written guidelines or policies to work --</p> <p>10 to reference.</p> <p>11 Q. Okay. When was the first time you</p> <p>12 met Katie Baker?</p> <p>13 A. I don't remember.</p> <p>14 Q. Can you give me a year?</p> <p>15 A. I would wager it was in 2015 when</p> <p>16 I started working at BuzzFeed, but I don't</p> <p>17 remember specifically when I would have</p> <p>18 met her.</p> <p>19 Q. Okay, that's fine.</p> <p>20 And did you meet her before then,</p> <p>21 before you went to work at BuzzFeed?</p> <p>22 A. I don't remember meeting her</p> <p>23 before BuzzFeed.</p>

22 (Pages 85 to 88)

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<p>1 Q. How did it come about that you met</p> <p>2 Katie Baker at BuzzFeed?</p> <p>3 A. I was -- I was a co-worker, so I</p> <p>4 would have met her in the context of</p> <p>5 working in the same New York office, and I</p> <p>6 also had been a long admirer of her work</p> <p>7 and of her steadfast reporting, so I would</p> <p>8 have introduced myself in the course of</p> <p>9 being co-workers and also to say I love</p> <p>10 your work.</p> <p>11 MR. COCKRELL: Did you get</p> <p>12 all of that?</p> <p>13 COURT REPORTER: Steadfast</p> <p>14 reporting and admirer of her work.</p> <p>15 MR. COCKRELL: Okay, thanks.</p> <p>16 My computer got a little</p> <p>17 jumbled there. I hate doing these things</p> <p>18 this way, it's hard.</p> <p>19 Q. How many times have you worked</p> <p>20 with Katie Baker on a story?</p> <p>21 A. I can't recall the exact number.</p> <p>22 Q. More than ten?</p> <p>23 A. More than ten.</p>	<p>1 Q. More than 20?</p> <p>2 A. More than 20.</p> <p>3 Q. More than 50?</p> <p>4 A. I don't remember. I can</p> <p>5 confidently say 20. Beyond that, hard to</p> <p>6 say.</p> <p>7 Q. How many of those 20 stories that</p> <p>8 you worked with her dealt with sexual</p> <p>9 assault or rape?</p> <p>10 A. A number of them.</p> <p>11 Q. Got a number for me?</p> <p>12 A. Unfortunately, I don't recall an</p> <p>13 exact number.</p> <p>14 Q. More than ten?</p> <p>15 A. I would say a significant portion</p> <p>16 would have been about sexual assault</p> <p>17 and/or rape and/or gender violence or</p> <p>18 abuse.</p> <p>19 Q. And when you say a significant</p> <p>20 portion, is that of the 20?</p> <p>21 A. Sure, yeah.</p> <p>22 Q. Have you ever worked with her on</p> <p>23 any other type article that didn't involve</p>
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<p>1 sexual assault, rape, or gender -- did you</p> <p>2 say gender bias?</p> <p>3 A. Gender violence.</p> <p>4 Q. Violence.</p> <p>5 A. I would say, yes, I have.</p> <p>6 Q. What type article was that?</p> <p>7 A. I worked with her on articles on a</p> <p>8 number of different topics but her --</p> <p>9 yeah, a number of different topics.</p> <p>10 Q. What would be her specialty? What</p> <p>11 is she known for as a reporter?</p> <p>12 A. She's known for being -- her</p> <p>13 specialty was doing, you know, she had a</p> <p>14 sterling reputation for doing jogged</p> <p>15 investigative and deep reporting.</p> <p>16 Q. And would you say 80 percent of it</p> <p>17 involves rape or sexual assault or</p> <p>18 whatever figure you say?</p> <p>19 A. I couldn't put a -- I couldn't put</p> <p>20 a percentage of it, but certainly of those</p> <p>21 stories -- a certain number of those</p> <p>22 stories did deal with that topic.</p> <p>23 Q. Would that have been what she was</p>	<p>1 best known for in BuzzFeed?</p> <p>2 A. I couldn't -- I think you have to</p> <p>3 ask other people. In my experience, that</p> <p>4 was one of a topic that she was -- that</p> <p>5 she worked on.</p> <p>6 Q. More times than not she would have</p> <p>7 been working on some type of sexual</p> <p>8 assault or rape or gender abuse of some</p> <p>9 kind; is that what you're telling me?</p> <p>10 A. I don't think I could say more</p> <p>11 times than not. I can say that she did</p> <p>12 work on a number of those stories.</p> <p>13 Q. How would you characterize your</p> <p>14 relationship with Katie Baker?</p> <p>15 A. One of great respect.</p> <p>16 Q. Is she a personal friend?</p> <p>17 A. Yeah, I would say that we've</p> <p>18 stayed in touch in the years since we've</p> <p>19 worked together.</p> <p>20 Q. Do you socialize together?</p> <p>21 A. I believe around the time that I</p> <p>22 was no longer at BuzzFeed she moved to</p> <p>23 another country so -- so, no.</p>

23 (Pages 89 to 92)

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<p>1 Q. Did you socialize when you worked 2 together at BuzzFeed? 3 A. Can you say more what you mean by 4 socialize please? 5 Q. Have drinks together, have dinner 6 together, go to each other's houses or 7 apartments. 8 A. I've never been to her house and 9 she's never been to my house. I can say 10 with certainty that we have been at a 11 birthday party of a mutual friend. 12 Q. You never met together after work 13 to have a drink or anything like that? 14 A. Oh, we have and with other 15 co-workers -- 16 Q. And how long -- I'm sorry, I cut 17 you off again. I'm sorry. 18 A. Oh, I just said as colleagues, 19 yes, I have had drinks with co -- with 20 colleagues after work and she's one of 21 those colleagues. 22 Q. Would that be pretty much a daily 23 basis during your time at BuzzFeed?</p>	<p>1 A. No. 2 Q. Weekly? 3 A. Occasionally. I can't give you an 4 exact number. I would say occasionally. 5 Q. Okay. 6 A. And that's referring to not with 7 Katie after work, that's saying going -- 8 like going out for a drink after work with 9 colleagues. 10 Q. That's fine. How would you 11 classify the type of reporting that 12 BuzzFeed does from a journalistic 13 perspective? 14 And I'm talking about the time 15 prior to the date of publication of the 16 Rondini article. 17 A. I would say BuzzFeed at the time 18 of the Rondini article was doing all sorts 19 of reporting in the matter of public 20 interest on any number of topics. 21 Q. Broad subjects? 22 A. I'm sorry, can you repeat that? 23 Q. Would you characterize it as very</p>
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<p>1 broad subjects, the articles? 2 A. Yeah, on many different topics. 3 Q. Can you give me an example of the 4 topics or the list of topics that BuzzFeed 5 would have reported on prior to the 6 publication of the Rondini article? 7 A. Sure. I know there were 8 departments that dealt with science or 9 with politics or with entertainment 10 industry. 11 So just a well really wide -- like 12 most newsrooms, it covered a really wide 13 swath of topics that were of interest and 14 relevance to the public. 15 Q. Did you have a department that 16 dealt primarily with sexual assault or 17 rape cases? 18 A. No. A department that was called 19 -- that said -- 20 Q. Or was assigned -- 21 A. -- in the title -- 22 Q. -- or was assigned sexual assault 23 and rape cases?</p>	<p>1 A. No, that was -- those types of 2 stories were dealt with by many different 3 departments. 4 Q. Do you know how many sexual 5 assault, rape cases -- rape cases were 6 reported on by Katie Baker as primary 7 reporter -- 8 A. I don't. 9 Q. -- during your tenure -- 10 A. I don't have that number. 11 Q. Do you know there were others that 12 she reported on, sexual assault or rape 13 cases? 14 A. Yes. 15 Q. Did you work on those cases? 16 A. It wouldn't be cases. It would be 17 stories, but I worked with her on other 18 stories that dealt with sexual harassment 19 or sexual abuse in various ways. 20 Q. Did you ever work with her on 21 another alleged rape or sexual assault 22 story? 23 A. Yes.</p>

24 (Pages 93 to 96)

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<p>1 Q. And what story was that?</p> <p>2 A. I can't remember another specific</p> <p>3 story, but I can tell you that I know I</p> <p>4 worked on her with other stories dealing</p> <p>5 in this topic area.</p> <p>6 Q. Do you recall where any of those</p> <p>7 sexual assault and rape stories</p> <p>8 originated, where they came from?</p> <p>9 A. What do you mean where they came</p> <p>10 from?</p> <p>11 Q. Where it allegedly occurred.</p> <p>12 A. I mean, all over the -- all over</p> <p>13 the country. BuzzFeed is a national</p> <p>14 publication and we were on the national</p> <p>15 desk, so the stories came from all over.</p> <p>16 Q. Do you remember any in particular</p> <p>17 that you worked on with Katie Baker?</p> <p>18 A. Not in this moment.</p> <p>19 Q. Do you recall if there were any</p> <p>20 other lawsuits that stem from the stories</p> <p>21 of sexual assault or rape where Katie</p> <p>22 Baker was the author of the article?</p> <p>23 A. I don't know the answer to that</p>	<p>1 question.</p> <p>2 Q. Did you ever have to give</p> <p>3 testimony or provide information of any</p> <p>4 kind in any lawsuit involving a story that</p> <p>5 Katie Baker authored other than obviously</p> <p>6 this one?</p> <p>7 A. This would be my first time as far</p> <p>8 as I remember.</p> <p>9 Q. And I think you anticipated this,</p> <p>10 but you've never authored a story for</p> <p>11 BuzzFeed yourself; is that correct?</p> <p>12 A. I did. I authored a few stories</p> <p>13 for BuzzFeed.</p> <p>14 Q. Okay. What type stories did you</p> <p>15 author?</p> <p>16 A. A mix of reported stories and</p> <p>17 personal essays and collections of other</p> <p>18 -- recommendation list of other stories.</p> <p>19 Q. Did any of them involve</p> <p>20 allegations of sexual assault or rape?</p> <p>21 A. That I bylined, yes.</p> <p>22 Q. For your byline?</p> <p>23 A. Sorry, I mean where my name was on</p>
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<p>1 the byline, yes.</p> <p>2 Q. Okay. And what stories were</p> <p>3 those?</p> <p>4 A. I can remember -- the story that I</p> <p>5 remember bylining was about allegations of</p> <p>6 sexual abuse against R Kelly, who is a</p> <p>7 musician.</p> <p>8 Q. Okay. Was there a lawsuit</p> <p>9 involved in that case, a civil suit?</p> <p>10 A. No.</p> <p>11 Q. Did anybody go to jail on that</p> <p>12 particular case that you reported on?</p> <p>13 A. What do you mean?</p> <p>14 Q. Or found guilty in a criminal</p> <p>15 case? Was there a criminal case involved</p> <p>16 in R Kelly?</p> <p>17 A. I believe he's currently on</p> <p>18 criminal trial.</p> <p>19 Q. Just haven't completed it yet; is</p> <p>20 that correct?</p> <p>21 A. To the best of my knowledge.</p> <p>22 Q. Do you know where that case is</p> <p>23 being tried at or is pending, what state?</p>	<p>1 A. I believe it might involve</p> <p>2 multiple states, but I don't want to get</p> <p>3 it wrong.</p> <p>4 Q. Do you know where he's in prison</p> <p>5 at, if he is in prison?</p> <p>6 A. I believe he's in jail in Chicago,</p> <p>7 Illinois.</p> <p>8 Q. Is he a serial type rapist or</p> <p>9 something?</p> <p>10 A. I don't know. I'm not --</p> <p>11 Q. Allegedly?</p> <p>12 A. -- it's an ongoing case.</p> <p>13 Q. Was it just one case of rape or</p> <p>14 multiple?</p> <p>15 A. I believe that the case involves</p> <p>16 multiple women accusing him of crimes, but</p> <p>17 I could not tell you the latest on that</p> <p>18 criminal case.</p> <p>19 Q. I got you, it's no big deal. I'm</p> <p>20 just trying get some background on this</p> <p>21 stuff.</p> <p>22 You won't be a witness in that</p> <p>23 case I don't think, would you?</p>

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<p style="text-align: right;">Page 101</p> <p>1 A. Nobody's told me, not as I</p> <p>2 understand.</p> <p>3 Q. Okay. Usually you don't call</p> <p>4 reporters, so I suspect you'll be okay on</p> <p>5 that unless you turned him in and exposed</p> <p>6 him, you know, and told them that he was</p> <p>7 the one that did it. But I figure you</p> <p>8 won't hear from anybody on that case.</p> <p>9 Okay. Were there any others?</p> <p>10 A. I edited many stories that</p> <p>11 involved these types of issues, but I</p> <p>12 can't recall another one where I was named</p> <p>13 as a reporter on it, so I won't name</p> <p>14 anymore.</p> <p>15 Q. I got you. How many sexual</p> <p>16 assault stories or rape stories have you</p> <p>17 edited on Katie Baker's reporting?</p> <p>18 A. I think this goes back the numbers</p> <p>19 questions from before. I couldn't give</p> <p>20 you a number.</p> <p>21 I know it was like a number of</p> <p>22 stories, over I believe it was two years</p> <p>23 we worked together.</p>	<p style="text-align: right;">Page 102</p> <p>1 Q. Okay. And excuse my ignorance,</p> <p>2 when you say bylining, what is the</p> <p>3 definition of bylining?</p> <p>4 A. Sorry. A byline is someone's name</p> <p>5 printed at the top of an article or</p> <p>6 sometimes the bottom of an article, but</p> <p>7 meaning your name is on the story as</p> <p>8 writer, yeah.</p> <p>9 Q. Were you bylined with Katie Baker</p> <p>10 on any stories?</p> <p>11 A. Not that I recall. I believe I</p> <p>12 only worked with her as an editor.</p> <p>13 Q. Okay. Did she work on the R Kelly</p> <p>14 story, Katie Baker?</p> <p>15 A. No.</p> <p>16 Q. I'm thinking there was one, a</p> <p>17 sexual assault type article written about</p> <p>18 a case in Miami. Are you familiar with</p> <p>19 that or worked on that?</p> <p>20 A. I can't remember.</p> <p>21 Q. Have you ever co-authored an</p> <p>22 article with Katie Baker?</p> <p>23 A. Not to my recollection.</p>
<p style="text-align: right;">Page 103</p> <p>1 Q. When is the first time you</p> <p>2 discovered that Katie Baker was even</p> <p>3 considering writing an article about the</p> <p>4 Rondini case?</p> <p>5 A. I believe that she emailed me in</p> <p>6 late 2016.</p> <p>7 Q. And what did say?</p> <p>8 A. I believe she would have told us</p> <p>9 that she received a tip about a story.</p> <p>10 Q. Do you know where she got that tip</p> <p>11 about a story?</p> <p>12 A. I don't remember.</p> <p>13 Q. Have you ever had a conversation</p> <p>14 with a Leroy Maxwell, an attorney in</p> <p>15 Birmingham, Alabama?</p> <p>16 A. I have not.</p> <p>17 Q. Do you know if anybody at BuzzFeed</p> <p>18 has had a conversation with Leroy Maxwell</p> <p>19 about the Rondini case?</p> <p>20 A. I couldn't say.</p> <p>21 Q. You as an editor, sometimes</p> <p>22 reporter, have you ever referred a case, a</p> <p>23 story that you were writing to an attorney</p>	<p style="text-align: right;">Page 104</p> <p>1 for a civil suit?</p> <p>2 A. I don't understand the question.</p> <p>3 Refer it like -- sorry, could you rephrase</p> <p>4 it?</p> <p>5 Q. As either an author of a story or</p> <p>6 editor of a story, have you personally</p> <p>7 ever referred the subject of the story on</p> <p>8 a sexual assault case or rape case to a</p> <p>9 civil attorney to have him review as</p> <p>10 filing a possible civil lawsuit against</p> <p>11 somebody?</p> <p>12 A. Not that I recall personally, no.</p> <p>13 Q. Do you know if Katie Baker has?</p> <p>14 A. I don't know.</p> <p>15 Q. At the time the Rondini story was</p> <p>16 published, immediately prior thereto, can</p> <p>17 you tell me the process from the beginning</p> <p>18 of an article being written all the way</p> <p>19 through the date it is published so I can</p> <p>20 understand it? You can just tell me about</p> <p>21 the Rondini case, how it progressed from</p> <p>22 the idea --</p> <p>23 MS. STROM: Objection,</p>

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<p>1 sorry. When you're done, I would like the</p> <p>2 question repeated.</p> <p>3 MR. COCKRELL: I'm hearing</p> <p>4 some type of background noise.</p> <p>5 MS. STROM: Probably my</p> <p>6 heat.</p> <p>7 COURT REPORTER: Do you want</p> <p>8 me to repeat it?</p> <p>9 MR. COCKRELL: Yeah, Nancy,</p> <p>10 please repeat it. I've forgotten the</p> <p>11 question now.</p> <p>12 (Whereupon, requested portion was</p> <p>13 read back by court reporter.)</p> <p>14 MS. STROM: And I did want</p> <p>15 to object. That seems very vague to me,</p> <p>16 and I think there's some issues about you</p> <p>17 calling it the Rondini case and the</p> <p>18 Rondini article.</p> <p>19 MR. COCKRELL: Yeah, I did</p> <p>20 kind of split it up kind of bad there.</p> <p>21 I'm sorry.</p> <p>22 I'll rephrase it.</p> <p>23 Q. I tell you to start with just tell</p>	<p>1 me at the time that the Rondini case was</p> <p>2 published, immediately prior thereto,</p> <p>3 explain to me how an article comes from a</p> <p>4 tip and how it progresses all the way to</p> <p>5 publication, the steps?</p> <p>6 MS. STROM: Objection. Do</p> <p>7 you mean for this article?</p> <p>8 Q. (By Mr. Cockrell) I was just</p> <p>9 asking in general since, you know, you</p> <p>10 objected to start with and then I was</p> <p>11 going to ask it how the Rondini case</p> <p>12 progressed.</p> <p>13 MS. STROM: Okay, great.</p> <p>14 Great.</p> <p>15 Q. (By Mr. Cockrell) Okay. That will</p> <p>16 be my next question.</p> <p>17 A. So to clarify, you're asking about</p> <p>18 the steps in the Rondini story?</p> <p>19 Q. First, I would just ask in general</p> <p>20 how it works, and then I was going to ask</p> <p>21 a second question about the Rondini, you</p> <p>22 know, how it progressed.</p> <p>23 So if you could just tell me first</p>
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<p>1 question is how at the time of the</p> <p>2 Rondini, immediately prior to it being</p> <p>3 published, how the standard operating</p> <p>4 procedure was, maybe that's the best way</p> <p>5 to say it, for a BuzzFeed story from the</p> <p>6 tip that a reporter received all the way</p> <p>7 through approval of publication and</p> <p>8 publication.</p> <p>9 A. It depended on the specific story,</p> <p>10 but generally the order is a reporter gets</p> <p>11 a tip for a story.</p> <p>12 A reporter talks it through with</p> <p>13 their editor to determine if it's worth</p> <p>14 them spending time looking into it and</p> <p>15 deciding -- and reporting on it.</p> <p>16 And then from there the story is</p> <p>17 drafted, the story may bring on -- the</p> <p>18 story -- the editors work on the text of</p> <p>19 the story and work with the writer.</p> <p>20 And then a fact checker may be</p> <p>21 brought on and the story may go through</p> <p>22 legal review, and then it is published but</p> <p>23 it really depends on the story itself.</p>	<p>1 Q. All right. And how did the</p> <p>2 Rondini case progress from the tip that</p> <p>3 the reporter received all the way through</p> <p>4 publication?</p> <p>5 MS. STROM: Objection.</p> <p>6 Pretty broad, but, Marisa, you can answer</p> <p>7 if you can.</p> <p>8 Q. (By Mr. Cockrell) Based on your</p> <p>9 personal knowledge.</p> <p>10 A. For the record, I do want to say</p> <p>11 that when -- they're all just terms of</p> <p>12 art, but this wasn't the Rondini case,</p> <p>13 this was the Rondini story.</p> <p>14 I am the editor on the story that</p> <p>15 ran at BuzzFeed and that's my involvement.</p> <p>16 Q. (By Mr. Cockrell) When I say case</p> <p>17 -- and I apologize, you're right, okay.</p> <p>18 But when I say case I mean Rondini</p> <p>19 story, so any time you've heard me say</p> <p>20 Rondini case, I'm talking about the</p> <p>21 Rondini story, okay?</p> <p>22 A. Got it.</p> <p>23 Q. And I apologize for that.</p>

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<p style="text-align: right;">Page 109</p> <p>1 A. Sure. So in the Rondini story 2 there was -- Katie brought the idea of 3 looking into the story to her editors. 4 I'm one of those editors. 5 And then Katie would have after 6 having, you know, conversations with her 7 editors about the potential for the story 8 and what a potential reporting process 9 might look like, she would have gone and 10 done reporting trips and phone calls and 11 done a ton of work to report out the story 12 and sort of take what started as just a 13 tip to get it to what the truth is, so, 14 you know, the tip is just a little germ of 15 a tip from someone. 16 And then the reporting process is 17 all about excavating what is the actual 18 facts there, and then Katie would have 19 written a draft and we went back and forth 20 with her revising the draft so that they 21 reflected the facts in a way for -- so 22 that they communicated the facts to the 23 reader.</p>	<p style="text-align: right;">Page 110</p> <p>1 And then that story was fact 2 checked again to again have a, you know, 3 another opportunity to make sure the facts 4 are right and that we're being accurate 5 and fair in our reporting to the reader 6 and then that story would have been 7 published over -- and this process was 8 over a number of months. 9 Q. When you say legally reviewed, 10 would that have been you mean by a lawyer 11 to have reviewed the story? 12 A. Yes. 13 Q. Would that be an in-house lawyer 14 or outside lawyer? 15 A. To my recollection, it would be 16 our in-house counsel. 17 Q. The two that you mentioned to me 18 earlier? 19 A. Yes. 20 Q. And what are they reviewing it 21 for? 22 MS. STROM: Objection. 23 Calls for attorney-client communication.</p>
<p style="text-align: right;">Page 111</p> <p>1 MR. COCKRELL: That was a 2 bad question, and I withdraw that one. 3 You're right on that one so I take that 4 one back, okay. 5 Q. All right. Does anybody from 6 outside of BuzzFeed review an article 7 before it's published? 8 MS. STROM: Objection. What 9 do you mean by outside of BuzzFeed? 10 Q. (By Mr. Cockrell) Not employed by 11 BuzzFeed, maybe contracted with, but not 12 employed by BuzzFeed. 13 A. Oh, I don't, I don't know. 14 Q. Do you know if anybody outside of 15 the hierarchy of BuzzFeed reviewed the 16 Rondini case before it was published? 17 MS. STROM: By Rondini case 18 do you mean Rondini story? 19 MR. COCKRELL: Rondini 20 story, yeah. Any time I say case, I'm a 21 lawyer and I keep saying case, but I mean 22 story. 23 MS. STROM: And I'm a</p>	<p style="text-align: right;">Page 112</p> <p>1 lawyer, so any time you say case, I'm 2 going to have remind you story. 3 MR. COCKRELL: Keep catching 4 me at it, so I appreciate it. 5 A. Specifically in the Rondini story 6 was there an outside contractor who was 7 brought in to work on it or in general do 8 -- I just can't speak for every story. 9 To my recollection, the folks who 10 I worked on the Rondini story that we 11 published were staff at BuzzFeed. 12 Q. So nobody from the outside not 13 employed by BuzzFeed -- 14 A. Can you clarify what you mean? Do 15 you mean would they have read this -- like 16 read a draft of the story? 17 Q. That's correct. 18 A. To the best of my knowledge I was 19 working with staff on this story. 20 Q. It was never sent out for outside 21 viewing to see if it was either accurate 22 or anything about the story that might 23 need to be corrected?</p>

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<p>1 MS. STROM: Objection. I</p> <p>2 believe it's been asked and answered, but</p> <p>3 you can answer, Marisa.</p> <p>4 A. I recall -- I don't recall sending</p> <p>5 the story to any, you know, outside group</p> <p>6 to review. Instead we worked with, you</p> <p>7 know, a number of people internally.</p> <p>8 Q. (By Mr. Cockrell) Does BuzzFeed</p> <p>9 ever do that, send a story outside the</p> <p>10 hierarchy of employees of BuzzFeed for</p> <p>11 someone to review an article?</p> <p>12 A. I can't speak to everything</p> <p>13 BuzzFeed has ever done. I know normally</p> <p>14 the reason that you aren't, for instance,</p> <p>15 sending out a story to be reviewed in</p> <p>16 advance is because you just don't do that.</p> <p>17 That's not how you normally do it</p> <p>18 in journalism. Yeah, that's my answer,</p> <p>19 not as I understand it.</p> <p>20 However, I was never the</p> <p>21 editor-in-chief for BuzzFeed. I only did</p> <p>22 the jobs I did at BuzzFeed.</p> <p>23 Q. You don't personally know that it</p>	<p>1 was sent outside of BuzzFeed, the Rondini</p> <p>2 story, for somebody to review that was not</p> <p>3 employed at BuzzFeed? You don't</p> <p>4 personally know; is that what you're</p> <p>5 telling me?</p> <p>6 A. I don't know or recall if it was</p> <p>7 sent to someone else.</p> <p>8 Q. That's all I was asking. All</p> <p>9 right.</p> <p>10 Tell me everything that you</p> <p>11 personally did from the beginning on</p> <p>12 advancing the Rondini story to</p> <p>13 publication.</p> <p>14 MS. STROM: Objection. A</p> <p>15 bit broad.</p> <p>16 But, Marisa, you can answer</p> <p>17 if you can.</p> <p>18 A. I worked with Katie and the rest</p> <p>19 of our team on talking through the story</p> <p>20 in her reporting and also on the line</p> <p>21 editing of itself of the story.</p> <p>22 Q. (By Mr. Cockrell) Was this done in</p> <p>23 person or by email or how was this</p>
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<p>1 accomplished?</p> <p>2 A. I recall that we had meetings in</p> <p>3 person. We also discussed over email and</p> <p>4 we also then went onto review over Google</p> <p>5 documents.</p> <p>6 Q. Were these in-person meetings was</p> <p>7 there any kind of record or recording made</p> <p>8 of these in-person meetings?</p> <p>9 A. I don't recall us recording our</p> <p>10 meetings, no.</p> <p>11 Q. Did anybody keep a history of</p> <p>12 those meetings? I'm talking about the</p> <p>13 ones in person.</p> <p>14 A. I don't recall.</p> <p>15 Q. Is that common that a history will</p> <p>16 be made of these type meetings between</p> <p>17 editors and reporters?</p> <p>18 A. No. You're saying is it common to</p> <p>19 keep notes or an agenda from that meeting?</p> <p>20 Q. Correct.</p> <p>21 A. No, not in my experience.</p> <p>22 Q. Okay. All right.</p> <p>23 I know that you said that you</p>	<p>1 reviewed the statements of Megan Rondini</p> <p>2 that were videotaped at the Homicide Unit.</p> <p>3 What else have you reviewed prior to the</p> <p>4 story being published?</p> <p>5 MS. STROM: Objection.</p> <p>6 To the extent you mean what</p> <p>7 else did you do before the story, you can</p> <p>8 answer.</p> <p>9 Q. (By Mr. Cockrell) For the story,</p> <p>10 for the story.</p> <p>11 A. I reviewed the felony packet, and</p> <p>12 I don't want to speak of anything else I</p> <p>13 reviewed.</p> <p>14 So I know that I reviewed</p> <p>15 additional documents. I reviewed -- I</p> <p>16 reviewed -- yeah, that's my -- I reviewed</p> <p>17 interview transcripts.</p> <p>18 I reviewed the felony packet, and</p> <p>19 if you have more specific questions about</p> <p>20 things I reviewed or didn't, I might</p> <p>21 better be able to answer.</p> <p>22 Q. I'm going to try to help you</p> <p>23 there. Did you review the videotape from</p>

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<p>1 Innisfree bar where Megan had gone that 2 night? 3 A. I don't recall whether I did or 4 not. 5 Q. Would it be -- as an editor is it 6 normal procedure to review all videotape 7 that potentially could be included or to 8 review it all before excerpts are made to 9 be published in an article or a story? 10 A. There isn't a standard operating 11 procedure. 12 Q. I'm sorry, I lost that last part. 13 A. I don't know of a standard 14 operating procedure. 15 Q. What about you personally as an 16 editor? Is it your standard procedure to 17 see everything, see all videotape and 18 everything on a story that's going to be 19 published for BuzzFeed? 20 A. I review information to -- as one 21 of many stop gaps and one of many people 22 who's helping a reporter tell a story. 23 Q. And this information or video that</p>	<p>1 you review do you review everything the 2 reporter has, has gathered, all the video? 3 A. I think it depends on a number of 4 factors. 5 Q. It's just not the same every time? 6 A. Yeah, and I would say I most of 7 the time don't review absolutely 8 everything, or I think it depends on the 9 situation but I don't always review 10 absolutely everything. 11 Q. Did you review all the videotapes, 12 security videotape, from Megan Rondini's 13 apartment or condo? 14 A. I don't recall whether or not I 15 reviewed that. 16 Q. As an editor is it your job to 17 review all videotape before deciding what 18 should be included in the story or not? 19 A. I would say no, that's not my job 20 as an editor. 21 Q. Whose job is that? 22 A. Like it depends on the situation. 23 Q. Who at BuzzFeed is their</p>
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<p>1 responsibility to do that -- 2 MS. STROM: Objection, asked 3 and answered. 4 Go ahead, Marisa. 5 Q. (By Mr. Cockrell) -- to review all 6 videotape before a story is published and 7 put out there for the public? 8 MS. STROM: Objection. What 9 videotape are you talking about? 10 Q. (By Mr. Cockrell) Well, I mean she 11 doesn't recall the Innisfree video seeing 12 it; is that correct? 13 A. Yeah, I cannot recall. 14 Q. And she can't recall looking at 15 the security video in its entirety from 16 the Houndstooth -- not the Houndstooth, 17 excuse me, the apartment or condo that 18 belonged to Megan Rondini of that night 19 after she left the Innisfree. 20 I asked the question who at 21 BuzzFeed would be responsible for viewing 22 all videotape and all evidence before a 23 case -- before a story is published or</p>	<p>1 approved that it be published? 2 MS. STROM: Objection. I 3 still don't understand what all video 4 you're talking about. All video in the 5 world? 6 MR. COCKRELL: All the video 7 in the Rondini case, I'll say that. 8 MS. STROM: Objection, I 9 still think it's quite vague. 10 But if you know, Marisa, you 11 can answer. 12 A. I don't know the answer to that 13 question or have an answer to that 14 question. 15 Q. (By Mr. Cockrell) Who would have 16 the answer to that question at BuzzFeed? 17 MS. STROM: Objection. I 18 still don't understand what the question 19 is so hard for me to understand who would 20 have that, but if you know, Marisa, you 21 can answer. 22 Q. (By Mr. Cockrell) You can answer. 23 A. Yeah, I don't understand the</p>

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<p>1 question, but I'm sure maybe if you asked</p> <p>2 the other people at BuzzFeed, maybe this</p> <p>3 is just not a question that I know -- I</p> <p>4 don't know how to answer that question.</p> <p>5 Q. Have you edited other stories</p> <p>6 where if there was videotape, relevant</p> <p>7 videotape, that you didn't review all of</p> <p>8 the videotape?</p> <p>9 MS. STROM: Objection.</p> <p>10 You can answer, Marisa.</p> <p>11 A. I don't always review every single</p> <p>12 thing before a story is published, no. I</p> <p>13 think it -- I guess the word -- I don't</p> <p>14 understand what you mean by the word</p> <p>15 relevant maybe is part of it.</p> <p>16 Q. (By Mr. Cockrell) Well, relevant</p> <p>17 enough to be included in the story.</p> <p>18 MS. STROM: Objection. I</p> <p>19 don't even know what the question is on</p> <p>20 the table now.</p> <p>21 MR. COCKRELL: She can read</p> <p>22 it back if you need her to.</p> <p>23 MS. STROM: Yeah, I do.</p>	<p>1 (Whereupon, requested portion was</p> <p>2 read back by court reporter.)</p> <p>3 Q. (By Mr. Cockrell) You can answer.</p> <p>4 MS. STROM: Objection.</p> <p>5 You can answer, Marisa, if</p> <p>6 you can.</p> <p>7 A. My answer is still that I don't</p> <p>8 review -- I don't always review every</p> <p>9 single -- everything in the universe</p> <p>10 before a story is published -- in the</p> <p>11 universe of a story before it is published</p> <p>12 is the best answer I can give on that</p> <p>13 question.</p> <p>14 Q. (By Mr. Cockrell) If BuzzFeed,</p> <p>15 like in the Rondini case, decides to</p> <p>16 include excerpts from videotape as opposed</p> <p>17 to the whole videotape, who makes the</p> <p>18 decision what clip is shown and what clip</p> <p>19 is not shown of the videotape?</p> <p>20 MS. STROM: Objection.</p> <p>21 Do you mean the Rondini</p> <p>22 story?</p> <p>23 MR. COCKRELL: I'm just</p>
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<p>1 asking in general right now.</p> <p>2 MS. STROM: You said the</p> <p>3 Rondini case so I'm asking if you mean the</p> <p>4 Rondini story.</p> <p>5 Q. (By Mr. Cockrell) I tell you what,</p> <p>6 let me ask the question again, okay.</p> <p>7 Listen to me. I'm going to try</p> <p>8 not to screw this up, okay.</p> <p>9 I'm asking in general this time,</p> <p>10 okay. Having been an editor, a deputy</p> <p>11 editor for BuzzFeed, did I say that right?</p> <p>12 Deputy editor?</p> <p>13 Who at BuzzFeed makes the decision</p> <p>14 when clips are going to be taken from a</p> <p>15 video, a lengthy video, to add to a story</p> <p>16 and published on the internet where people</p> <p>17 can watch it, who makes the decision what</p> <p>18 -- what clip the clip will be and what</p> <p>19 will not be included from the video?</p> <p>20 A. I think multiple people review and</p> <p>21 weigh in, the reporter, the fact checker,</p> <p>22 and the editor, and the editor,</p> <p>23 supervising editor, is usually the person</p>	<p>1 with many of these kinds of decisions who</p> <p>2 makes the final call if someone needs to</p> <p>3 be the final shot caller.</p> <p>4 Q. So would you agree with me in</p> <p>5 order to make that decision you would have</p> <p>6 to see all the video; is that a fair</p> <p>7 statement?</p> <p>8 MS. STROM: Objection.</p> <p>9 A. If someone was editing the video</p> <p>10 they would have to see the video, correct.</p> <p>11 Q. (By Mr. Cockrell) All right. Now,</p> <p>12 that person in the Rondini case that would</p> <p>13 be responsible for, the editor, that would</p> <p>14 be partially you?</p> <p>15 I'm talking about the Rondini</p> <p>16 story, not case. I keep saying that.</p> <p>17 A. I did watch video of the Rondini</p> <p>18 story. Did you freeze? Did I freeze?</p> <p>19 Q. You did -- your answer is you did</p> <p>20 watch video of the Rondini story?</p> <p>21 A. I did watch video for the Rondini</p> <p>22 story. The supervising editor for this</p> <p>23 story is Tina Susman who was the editor of</p>

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<p>1 the -- when I refer to the supervising</p> <p>2 editor, mine and Katie's supervisor was</p> <p>3 Tina Susman.</p> <p>4 Q. Do you know if you saw the full</p> <p>5 video or just the clips that were --</p> <p>6 MS. STROM: Objection, what</p> <p>7 video are we speaking about now?</p> <p>8 Q. (By Mr. Cockrell) The full video</p> <p>9 of Megan Rondini either at the -- when her</p> <p>10 statement was taken at Homicide, the</p> <p>11 Innisfree video, or the video where she's</p> <p>12 leaving -- entering and leaving her</p> <p>13 apartment, the security video.</p> <p>14 Did you see it all or just what</p> <p>15 was some clip that was provided to you?</p> <p>16 MS. STROM: Objection. I'm</p> <p>17 confused.</p> <p>18 I don't think there's any</p> <p>19 security video that there's clips of in</p> <p>20 the story, so you're combining all sorts</p> <p>21 of different things here.</p> <p>22 There's clips of the</p> <p>23 interrogation but you asked her if she saw</p>	<p>1 the security video, so.</p> <p>2 Q. (By Mr. Cockrell) Did you</p> <p>3 understand my question?</p> <p>4 A. I thought you were talking about</p> <p>5 security video. I hadn't heard of</p> <p>6 security -- that's why -- maybe that's</p> <p>7 part of why I was confused. I don't know</p> <p>8 what the security video is.</p> <p>9 Q. So the security video from Megan's</p> <p>10 condo and apartment was never provided to</p> <p>11 you?</p> <p>12 A. I don't recall seeing that video.</p> <p>13 Q. As an editor for BuzzFeed, would</p> <p>14 you want to see that video?</p> <p>15 MS. STROM: Objection.</p> <p>16 This is misstating to the</p> <p>17 extent she's saying she didn't, she does</p> <p>18 not recall, but go ahead, Marisa.</p> <p>19 A. I don't know enough about what</p> <p>20 video we're talking about.</p> <p>21 Q. (By Mr. Cockrell) Because you've</p> <p>22 never seen it; is that right?</p> <p>23 MS. STROM: Objection.</p>
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<p>1 Asked and answered. But go ahead.</p> <p>2 A. Yeah, I don't -- having -- I don't</p> <p>3 remember reviewing the video we're talking</p> <p>4 about so I don't know how to answer the</p> <p>5 question.</p> <p>6 Q. But as an editor if the video</p> <p>7 affected the story and was in the</p> <p>8 possession of the reporter, would you want</p> <p>9 to see that as an editor?</p> <p>10 MS. STROM: Objection. She</p> <p>11 just said over and over that she didn't</p> <p>12 review everything.</p> <p>13 But, Marisa, you can answer</p> <p>14 again that she doesn't always review</p> <p>15 everything.</p> <p>16 MR. COCKRELL: Can you let</p> <p>17 her answer the question please? Just</p> <p>18 state your objection, I appreciate it.</p> <p>19 A. I don't always review everything</p> <p>20 and I don't -- so I don't. That's, again,</p> <p>21 why I'm having trouble answering the</p> <p>22 question. I don't always view every</p> <p>23 single thing.</p>	<p>1 Q. Okay. All right. Did you see the</p> <p>2 entire video of Megan's statement at</p> <p>3 Homicide?</p> <p>4 MS. STROM: Objection.</p> <p>5 Unclear to me what video we're talking</p> <p>6 about, but if you know, Marisa, go ahead.</p> <p>7 A. Can you clarify? Do we mean the</p> <p>8 interview video clips of which were</p> <p>9 included in the final published story?</p> <p>10 Q. (By Mr. Cockrell) That's right.</p> <p>11 I'm asking if you saw the entire video of</p> <p>12 Megan's statement there in Homicide?</p> <p>13 A. Correct, I recall watching the</p> <p>14 entire video.</p> <p>15 Q. And where did you watch it at?</p> <p>16 A. I believe that would have been on</p> <p>17 my BuzzFeed-issued laptop at the BuzzFeed</p> <p>18 office near Union Square in New York City.</p> <p>19 Q. And who decided what clips would</p> <p>20 be included in the story, Megan Rondini</p> <p>21 story, and what portion of the video would</p> <p>22 not be included?</p> <p>23 A. I believe multiple team members</p>

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<p>1 were involved. Myself, Tina Susman, Katie 2 Baker, and then Sharmila, the fact 3 checker, were all reviewed the full video. 4 Q. Okay. Was the content discussed 5 as to what should be included and what 6 should be excluded from the Rondini story? 7 A. Which content? Globally or which 8 content from the video? 9 Q. All of the video. All of the 10 video. 11 Was there a discussion as to what 12 portion of the video statements should be 13 included and what should be excluded from 14 the Rondini story? 15 A. Sure, yes. 16 Q. And how was it determined what 17 should be included? 18 A. I can't remember the content of 19 those conversations at the time. 20 Q. Were those conversations verbal or 21 were they by email? 22 A. I would -- I don't remember. 23 Q. Do you recall if anybody had any</p>	<p>1 reservations about what portion of the 2 video was being left out from the Rondini 3 interview? 4 A. I don't recall specific 5 reservations. I remember that it was a 6 topic of discussion to figure out what was 7 the most fair and in the interest of the 8 reader portions to include, but I don't 9 remember any specific reservations. 10 I couldn't quote you back 11 recollections from those conversations, 12 and I don't at hand at least have written 13 correspondence. 14 Q. Okay. Do you recall ever in your 15 meetings with the group-- Katie Baker, 16 Tina, and I can't remember who else was 17 there, Sharmila? Did I say her name 18 correctly? 19 A. Sharmila, yeah. 20 Q. Do you recall if the security 21 video of Megan Rondini's apartment on the 22 night in question discussions about 23 whether it should be totally excluded from</p>
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<p>1 the story or used in the story? 2 A. I don't remember. 3 Q. Do you remember ever seeing the 4 security video from Megan's apartment for 5 that night? 6 MS. STROM: Objection. 7 I believe asked and 8 answered, but go ahead. 9 Q. (By Mr. Cockrell) I'm sorry, I 10 couldn't hear you. 11 A. I don't remember. 12 Q. Is that something you would have 13 liked to have seen? 14 MS. STROM: Objection. 15 Asked and answered, but go ahead, Marisa. 16 A. I don't have an opinion. I don't 17 know. 18 Q. (By Mr. Cockrell) If you're 19 putting in the story there's something 20 sinister about blood not being withdrawn, 21 about date rape or drunk or anything like 22 that, wouldn't you want to be able to 23 observe the alleged victim's behavior and</p>	<p>1 how they acted -- 2 MS. STROM: Objection -- 3 Q. (By Mr. Cockrell) -- wouldn't you 4 want to as an editor to be able to see 5 that? 6 MS. STROM: Objection. To 7 the extent you're talking about the story, 8 that completely mischaracterizes the story 9 but you can answer, Marisa. 10 Q. (By Mr. Cockrell) You can answer. 11 You can answer. 12 A. I don't know how to answer that 13 specific question. The story doesn't say 14 something is sinister, but I can say that 15 as I said before, I don't always review 16 every single piece of reporting before a 17 story is published. 18 Q. If a reporter is putting in the 19 story about the alleged victim being 20 blacked out during the relevant time 21 periods of the video from the security 22 cameras at the apartment of Megan Rondini, 23 wouldn't you want to see video of Megan</p>

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1 Rondini to judge her actions as to  
 2 determine whether or not she was  
 3 unconscious or incoherent or anything like  
 4 that before you put a published story out?  
 5 Wouldn't you want to see that as an  
 6 editor?  
 7 MS. STROM: Objection.  
 8 Completely mischaracterizes the article,  
 9 and I'm having trouble understanding the  
 10 question, but if you do, Marisa, please go  
 11 ahead.  
 12 A. Again, I don't remember whether or  
 13 not I saw that video.  
 14 Q. (By Mr. Cockrell) My question was  
 15 would you have wanted to see that video  
 16 before you approved the story to be  
 17 published to the public?  
 18 MS. STROM: Objection.  
 19 A. Again, I don't review every single  
 20 piece of --  
 21 Q. (By Mr. Cockrell) I know. You  
 22 said that three times, I'm asking you  
 23 another question.

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1 others just yet, but, you know, I'm just  
 2 asking would you have wanted to see all  
 3 the evidence before a story was published,  
 4 how about that? Can you answer that  
 5 question?  
 6 MS. STROM: That question  
 7 you've asked many times, and it's been  
 8 answered, but, Marisa, you can go ahead.  
 9 Q. (By Mr. Cockrell) You can answer  
 10 that. It hasn't been asked like that.  
 11 A. I feel confident in my work as an  
 12 editor on these types of stories and I  
 13 don't always review every detail, every  
 14 video say or every audio recording before  
 15 it's published, so I can only refer to my  
 16 experience which is that I don't.  
 17 Q. Okay. All right. Thank you.  
 18 MS. STROM: If you're headed  
 19 to a new topic soon, it may be time for a  
 20 break again. It's been about another hour  
 21 and 15 or so --  
 22 MR. COCKRELL: Yeah, I'm  
 23 almost there. Let me just look at this

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1 I'm asking you wouldn't you as an  
 2 editor, professional editor with BuzzFeed,  
 3 wanted to have seen the entire security  
 4 video so you could judge whether or not  
 5 she was unconscious, whether or not she  
 6 was incoherent or whether she was  
 7 staggering around drunk?  
 8 Wouldn't you have wanted to have  
 9 seen that before you published the article  
 10 and approved it to be published to the  
 11 public?  
 12 MS. STROM: Objection.  
 13 A. I guess what I'm not following  
 14 here is when you say wouldn't you, which  
 15 feels to imply that you're saying I would,  
 16 I don't even know the video that we're  
 17 talking about.  
 18 As I've said to you, I was an  
 19 editor on this story. I was one of  
 20 multiple editors and the fact checker  
 21 working on this story --  
 22 Q. (By Mr. Cockrell) And I'm just  
 23 asking about you in particular, not the

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1 real quick and make sure I don't have any  
 2 more questions on that subject.  
 3 MS. STROM: Of course.  
 4 A. Thank you.  
 5 Q. (By Mr. Cockrell) Could you as an  
 6 editor have asked Katie Baker to see all  
 7 videotape that was available for the  
 8 Rondini story?  
 9 MS. STROM: I'm sorry, I  
 10 didn't hear the beginning. Was it could  
 11 you have asked Katie Baker; is that what  
 12 you asked?  
 13 MR. COCKRELL: Yes.  
 14 MS. STROM: Okay. Sorry.  
 15 A. I don't remember if I did or  
 16 didn't.  
 17 Q. (By Mr. Cockrell) Is that your  
 18 answer?  
 19 A. Am I understanding the question  
 20 right? I don't remember if I did or  
 21 didn't ask her to review.  
 22 I could ask her a number -- I  
 23 could ask her a number of things, and,

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<p>1 sure, I could hypothetically have asked</p> <p>2 her anything.</p> <p>3 Q. Okay. All right. Thank you.</p> <p>4 So you as the editor could see</p> <p>5 anything you want if you chose to do so in</p> <p>6 the Rondini story before it's published?</p> <p>7 MS. STROM: Objection. Do</p> <p>8 you mean what Katie Baker had?</p> <p>9 MR. COCKRELL: Yes.</p> <p>10 A. I mean in the same way that in</p> <p>11 this deposition or talking to my husband I</p> <p>12 can say anything I want. You know, it's a</p> <p>13 relationship where you're conversing with</p> <p>14 someone, so, sure, there's any number of</p> <p>15 paths or questions you could ask someone.</p> <p>16 Q. (By Mr. Cockrell) As an editor,</p> <p>17 you had that right at BuzzFeed; is that</p> <p>18 correct?</p> <p>19 To ask the reporter to see all</p> <p>20 relevant evidence that was available to</p> <p>21 the report; is that a correct statement?</p> <p>22 A. I guess I'm just -- can you be</p> <p>23 more specific when you say evidence? Like</p>	<p>1 what you mean when you talk about every</p> <p>2 relevant --</p> <p>3 Q. Video, any other evidence that the</p> <p>4 reporter had in their possession, you</p> <p>5 could -- you had the right to ask for it</p> <p>6 and they would have had to produce it to</p> <p>7 you; is that correct or wrong? You tell</p> <p>8 me.</p> <p>9 A. I can ask a reporter to review say</p> <p>10 a video or to report a felony packet,</p> <p>11 things like that, sure.</p> <p>12 Q. Okay. That's all I needed.</p> <p>13 MR. COCKRELL: All right.</p> <p>14 Might be a good time to take a break.</p> <p>15 MS. STROM: Great. It's</p> <p>16 12:30 here. Do you want a short break?</p> <p>17 Do you want a lunch break? I don't know</p> <p>18 how much you've got left to go.</p> <p>19 MR. COCKRELL: What time is</p> <p>20 it?</p> <p>21 VIDEOGRAPHER: I'll go off</p> <p>22 the record.</p> <p>23 Off the record at 11:37.</p>
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<p>1 (Lunch recess was taken.)</p> <p>2 VIDEOGRAPHER: Back on</p> <p>3 12:25 p m.</p> <p>4 Q. (By Mr. Cockrell) After the</p> <p>5 lawsuit was filed did you have a</p> <p>6 conversation with Katie Baker or Ben Smith</p> <p>7 or anybody else at BuzzFeed about the</p> <p>8 lawsuit? I'm not talking about lawyers.</p> <p>9 MS. STROM: Objection. I</p> <p>10 think we're talking about this lawsuit.</p> <p>11 Go ahead, Marisa.</p> <p>12 Q. (By Mr. Cockrell) About this</p> <p>13 lawsuit.</p> <p>14 A. Sorry, this lawsuit that I'm being</p> <p>15 deposed in; right?</p> <p>16 Q. Right, that's correct. If I say</p> <p>17 this lawsuit, I mean the one we're here on</p> <p>18 today.</p> <p>19 A. Okay. Got it.</p> <p>20 I've spoken to the lawyers that</p> <p>21 are here on this call about it.</p> <p>22 Q. I'm not interested what you had</p> <p>23 conversations with them. Other than that.</p>	<p>1 A. I recall having a conversation</p> <p>2 with Katie Baker about the existence of a</p> <p>3 lawsuit.</p> <p>4 Q. And what was said in that</p> <p>5 conversation?</p> <p>6 MS. STROM: Objection, to</p> <p>7 the extent it was done at the direction of</p> <p>8 counsel, don't know.</p> <p>9 But if you can answer</p> <p>10 without talking about any direction of</p> <p>11 counsel, you may do so.</p> <p>12 A. My recollection is that it was</p> <p>13 just to say that this was -- that this was</p> <p>14 happening, and then in the time -- forgive</p> <p>15 me for forgetting how long this has been</p> <p>16 going on, I really dealt with the counsel</p> <p>17 who are on this call rather than talking</p> <p>18 to Katie about it.</p> <p>19 Q. (By Mr. Cockrell) Okay. Is that</p> <p>20 all of the conversation you recall having</p> <p>21 with Katie or Ben or anybody else at</p> <p>22 BuzzFeed about the lawsuit?</p> <p>23 A. I have to admit, I don't even</p>

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<p>1 remember when the lawsuit was first filed,  2 so I just really --  3 Q. That's fair enough --  4 A. -- don't remember any conversation  5 about it.  6 Q. Okay. Could this article have  7 been written without listing the  8 individual names of Josh Hastings and Adam  9 Jones?  10 A. I believed it was relevant to the  11 story to include the names of the officers  12 because we were describing the  13 investigation.  14 Q. Well, why couldn't you have just  15 had the investigators? Is there any  16 reason you had to name them individually?  17 A. It's important for us for  18 transparency with readers when we're  19 speaking to people, especially in an  20 official capacity to show that this is,  21 this is real, we're not making it up.  22 We're quoting real documents.  23 We're quoting -- we're describing real</p>	<p>1 events.  2 Q. So you don't think it could have  3 been written without including their  4 individual names, the investigators?  5 A. Personally, I think we were right  6 to include the names of the officers for  7 the reasons I described.  8 Q. Any other reason other than what  9 you just said in previous -- answer to  10 previous question?  11 A. No. Just to make sure I  12 understand, is there another reason  13 besides communicating the facts to the  14 reader that I would include the names of  15 the officers?  16 Q. I get to ask the questions; you  17 get to answer them, so --  18 MS. STROM: She was trying  19 to clarify your question. She was asking  20 you what your question was, Bob.  21 MR. COCKRELL: Can you  22 repeat the question for her?  23 She's going to read it back</p>
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<p>1 to you because I forgot it already.  2 (Whereupon, requested portion was  3 read back by court reporter.)  4 Q. (By Mr. Cockrell) As to the reason  5 why you included their individual names,  6 the Investigators, Josh Hastings and Adam  7 Jones.  8 A. From my perspective, we included  9 the names of the officers for the reason  10 that I described in my previous answer.  11 Q. Okay.  12 A. So no.  13 Q. Did anybody at BuzzFeed to your  14 knowledge ever question whether they  15 should include the names of the individual  16 investigators or not in the story, the  17 Rondini story?  18 A. I know that we wouldn't have  19 published the story if we didn't all agree  20 that it was the right decision, but I  21 don't recall if there were individual --  22 like I can't recall the answer to that  23 question.</p>	<p>1 Q. If one person had objected in the  2 group, would their names have been  3 included?  4 A. The way that these reporting  5 processes works is it involves many  6 people. It involves editors. It involves  7 legal review. It involves the reporter.  8 It involves the fact checker.  9 So usually when decisions,  10 editorial decisions are being made, they  11 involve multiple people so all of the  12 people involved in this story would have  13 had those conversations and come to a  14 conclusion.  15 Q. And if one person objected, what  16 would happen to the story?  17 A. In one person objected, the group  18 would have had a discussion or a number of  19 discussions and come to some conclusion.  20 Q. All right. Did you ever prior to  21 publication of the story, ever review the  22 DCH response to Katie Baker's letter  23 stating their procedure for handling</p>

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<p>1 alleged sexual assault and rape victims?</p> <p>2 A. I recall seeing Katie Baker's</p> <p>3 questions, email back and forth between</p> <p>4 her and Gary Hood, but I don't want to</p> <p>5 misspeak if this is a different document,</p> <p>6 so I just want to know if that's what</p> <p>7 you're talking about.</p> <p>8 Q. Gary Hood was the Homicide -- head</p> <p>9 of Homicide. So I guess what I'm saying</p> <p>10 is Brad Fisher was the DCH responder.</p> <p>11 Did you ever review emails from</p> <p>12 Brad Fisher stating the DCH policy with</p> <p>13 regard to the handling of sexual assault</p> <p>14 patients and rape victims?</p> <p>15 A. I know that I reviewed many</p> <p>16 documents in the process of editing this</p> <p>17 story and that there were also multiple</p> <p>18 other people working on the story, so</p> <p>19 Sharmila, the fact checker, Tina, an</p> <p>20 additional editor.</p> <p>21 And between us, and, you know,</p> <p>22 Katie, of course, the reporter, so I can't</p> <p>23 recall whether I reviewed that specific</p>	<p>1 email, but I know that I reviewed many and</p> <p>2 other folks have also did.</p> <p>3 Q. Okay. So you don't remember</p> <p>4 specifically the email from Brad Fisher to</p> <p>5 Katie in responding in regard to how they</p> <p>6 handle -- procedure for handling sexual</p> <p>7 assault victims and rape victims in the</p> <p>8 emergency room?</p> <p>9 A. I don't remember that -- sorry. I</p> <p>10 don't remember that specific email, but I</p> <p>11 just don't remember.</p> <p>12 Q. Okay. I'm saving us some time</p> <p>13 because I've covered all of this out of</p> <p>14 order so I'm going to check it off.</p> <p>15 Did you ever see prior to</p> <p>16 publication Megan Rondini's Snapchats from</p> <p>17 her cell phone and text messages from her</p> <p>18 cell phone to her friends during the time</p> <p>19 of the alleged assault or prior to?</p> <p>20 A. I don't remember -- I can't recall</p> <p>21 the moment of reviewing those</p> <p>22 specifically.</p> <p>23 I do know that they are -- there</p>
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<p>1 are text messages mentioned in the story,</p> <p>2 that they were reviewed. It says the text</p> <p>3 messages were reviewed, so I believe that</p> <p>4 someone on the team, multiple people on</p> <p>5 the team, would have reviewed those</p> <p>6 messages, but I don't remember personally.</p> <p>7 Q. Do you know who would have in</p> <p>8 particular reviewed those text messages</p> <p>9 and emails -- excuse me, text messages and</p> <p>10 Snapchats?</p> <p>11 A. If Katie Baker discovered any sort</p> <p>12 of document through her reporting, Katie</p> <p>13 would have reviewed it.</p> <p>14 And I know, you know, it's very</p> <p>15 likely that between one of the editors,</p> <p>16 either Tina or myself, would have reviewed</p> <p>17 and then Sharmila, the fact checker,</p> <p>18 especially her role is to make sure that</p> <p>19 every single item that runs in the</p> <p>20 published story is reviewed.</p> <p>21 Q. But you don't if you did or not?</p> <p>22 A. I don't remember. I know that I</p> <p>23 can say for sure that I looked at many,</p>	<p>1 many things in the process of reporting</p> <p>2 this story, but I can't remember very well</p> <p>3 specifically.</p> <p>4 Q. Do you know where Katie Baker got</p> <p>5 the text messages and Snapchats, that</p> <p>6 information?</p> <p>7 A. I don't recall where she got that.</p> <p>8 Q. Do you remember seeing a text</p> <p>9 message from Megan to one of her friends</p> <p>10 on the way to Bunn's house saying she was</p> <p>11 going to guck him, g-u-c-k? Do you</p> <p>12 remember that text message?</p> <p>13 A. I don't remember that text</p> <p>14 message.</p> <p>15 Q. Is that something you would have</p> <p>16 remembered if you heard it editing this</p> <p>17 story on sexual abuse and assault?</p> <p>18 MS. STROM: Objection.</p> <p>19 Objection.</p> <p>20 Mischaracterizing the story,</p> <p>21 objection. But go ahead, Marisa.</p> <p>22 A. I don't know whether -- I don't</p> <p>23 know how to say whether I would or would</p>

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<p>1 not have remembered something.</p> <p>2 Q. (By Mr. Cockrell) Okay.</p> <p>3 A. I just know that I didn't.</p> <p>4 Q. I think I asked this question, if</p> <p>5 I did I apologize, but have you ever taken</p> <p>6 a news writing course in college or</p> <p>7 anywhere else?</p> <p>8 MS. STROM: I'm sorry. What</p> <p>9 kind of writing course was that?</p> <p>10 MR. COCKRELL: News writing</p> <p>11 course.</p> <p>12 MS. STROM: Sorry, news.</p> <p>13 A. I don't recall ever taking a news</p> <p>14 writing course.</p> <p>15 Q. (By Mr. Cockrell) Do you consider</p> <p>16 the Rondini story news?</p> <p>17 A. I think it's in an investigative</p> <p>18 story. I say news is a story in the</p> <p>19 public interest, so sure.</p> <p>20 Q. All right. Have you ever taken a</p> <p>21 feature writing course ever in college or</p> <p>22 anywhere else?</p> <p>23 A. No, but I teach at NYU. I'm a --</p>	<p>1 they bring me in once a semester to teach</p> <p>2 a feature writing course.</p> <p>3 Q. Okay. What course -- you said</p> <p>4 it's feature writing. What's the name of</p> <p>5 the course that you're brought in at NYU?</p> <p>6 A. I don't want -- I don't want to</p> <p>7 minimize you and check. I believe it's</p> <p>8 called feature writing.</p> <p>9 Q. And how long have you been doing</p> <p>10 that?</p> <p>11 A. I've done it three times I</p> <p>12 believe, and I just got an email to ask me</p> <p>13 to come in again to -- I'm like a guest</p> <p>14 lecturer I guess you would say in the</p> <p>15 course.</p> <p>16 Q. Okay. Do you provide any written</p> <p>17 material to the students or anybody else?</p> <p>18 A. In advance of the lecture I send a</p> <p>19 write-up with a few -- it changes every</p> <p>20 semester depending on what sort is a</p> <p>21 recent article, and I send over a few</p> <p>22 ideas for writers to read in advance and</p> <p>23 then I send over some ideas of sort of</p>
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<p>1 like why we're talking about certain</p> <p>2 stories.</p> <p>3 Q. Can you -- can you provide copies</p> <p>4 of that written material to your lawyer so</p> <p>5 that we could get a copy of it?</p> <p>6 MS. STROM: Objection. I</p> <p>7 don't believe that was even called for or</p> <p>8 that there's any documents, but we can</p> <p>9 deal with that off line.</p> <p>10 A. To clarify, it's an email that I</p> <p>11 send to the professor of the class. If</p> <p>12 it's fine with everyone I have, you know,</p> <p>13 but I'm speaking specifically about the</p> <p>14 prep email I send to the professor and</p> <p>15 students in advance of the class.</p> <p>16 Q. (By Mr. Cockrell) Who is the</p> <p>17 professor that you provide guest lectures</p> <p>18 for?</p> <p>19 A. Sara -- man, what is her last</p> <p>20 name? I could confirm for you. I call</p> <p>21 her Sara. She is a retired journalist who</p> <p>22 is a professor at NYU.</p> <p>23 Q. Where was she retired from as a</p>	<p>1 journalist?</p> <p>2 A. I believe she's been a journalism</p> <p>3 professor for years, and maybe taught at</p> <p>4 the -- maybe worked at the AP, but I could</p> <p>5 be confusing her résumé with Tina Susman</p> <p>6 who was my boss at BuzzFeed who worked at</p> <p>7 the AP.</p> <p>8 Q. Well, can you provide that name</p> <p>9 and that material to your lawyer so we can</p> <p>10 discuss if we can get it or not?</p> <p>11 MS. STROM: We can talk off</p> <p>12 line about that.</p> <p>13 THE WITNESS: Sure, we can</p> <p>14 talk off line.</p> <p>15 MR. COCKRELL: Okay, all</p> <p>16 right.</p> <p>17 Q. I'm going to have to probably</p> <p>18 spell this last name to you, and ask you</p> <p>19 if you know who it is. Dennis, H-u-y-n-h,</p> <p>20 Huynh?</p> <p>21 A. Huynh I believe is the last name.</p> <p>22 Yes, I do know Dennis Huynh.</p> <p>23 Q. Is it Lynn? How do you spell it?</p>

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<p>1 A. I believe it's pronounced like 2 W-y-n-n, like the Wynn resort. 3 Q. I was looking at an email and it's 4 from you to him, and it says Dennis Huynh, 5 H-u-y-n-h. Do you think that's the same 6 person you're describing? 7 A. Yes. 8 Q. Okay. All right. Who is he? 9 A. I believe his title was art 10 director at BuzzFeed. 11 Q. And what does he do for BuzzFeed 12 as art director? 13 A. At the time I worked at BuzzFeed 14 his job was to work with reporters and 15 editors on coming up with art for -- that 16 goes with the story. 17 Q. Is that for the actual story or, 18 you know -- is it for the actual story or 19 more than that, the art? 20 MS. STROM: Objection. I'm 21 confused. 22 Q. (By Mr. Cockrell) I think I asked 23 it bad. The art he comes up with would be</p>	<p>1 included in the story; is that what he 2 does? 3 A. Yes. He would be working with say 4 a photographer or say an illustrator or 5 others to come up to review and include 6 art in a story when you're reading a 7 published news story, it would be the art 8 associated. 9 Q. All right. And what does start a 10 new thread mean? 11 If he said he was going to start a 12 new thread, what did he mean by that? 13 MS. STROM: Objection. 14 You can answer, Marisa. 15 A. I can't know what he would have 16 thought. I can speak to -- would it help 17 to say what I think a thread is. 18 Q. (By Mr. Cockrell) Yeah, what you 19 took it as he was going to do? Tell me 20 that. 21 A. Sure. 22 MS. STROM: Objection. You 23 mean what he took it as in a specific</p>
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<p>1 email? 2 Q. (By Mr. Cockrell) Yes, actually. 3 I can show you, it's BuzzFeed -- 4 A. That would help. 5 MS. STROM: Do you want to 6 mark something as an exhibit? 7 MR. COCKRELL: Yeah, I can 8 do that. I didn't really want to 9 introduce it. I just wanted to ask what 10 that meant to her, starting a new thread. 11 Q. I'll ask it that way. What does 12 that mean to you, having worked at 13 BuzzFeed, starting a new thread? 14 A. Like the word thread I think in 15 that context could mean a number of 16 different things. 17 Maybe we're having a conversation 18 and we're starting a new thread of 19 conversation. Is there like -- if there's 20 a specific -- I could probably give you 21 more specifics if it was based on 22 something specific. 23 Q. I'm looking at this email trying</p>	<p>1 to do without introducing it. It's from 2 you and it's dated January 25th, 2017, 3 it's to Dennis, it's cc'd news design, 4 news design and it's got his email 5 address, news photo, BuzzFeed, subject 6 national art memo, 1/24/17. What's -- 7 MS. STROM: If you're going 8 to talk about a specific email, please 9 mark it so she can review it. 10 MR. COCKRELL: Okay. Go 11 ahead and mark that. 12 (Off-the-record discussion.) 13 (Whereupon, a document was marked 14 as Plaintiff's Exhibit No. 45 and 15 is attached to the original 16 transcript.) 17 Q. This will be Plaintiff's 18 Exhibit 45. 19 Marisa, I think if you look at 20 Scotch's screen, it should be up there for 21 you to review right now. Can you see 22 that? 23 A. I can. Excuse me, Scotch, would</p>

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<p>1 you mind if you could zoom in a little bit</p> <p>2 on your screen? I appreciate it. Thank</p> <p>3 you.</p> <p>4 MR. RITCHEY: Is that</p> <p>5 better?</p> <p>6 THE WITNESS: That's better,</p> <p>7 thank you so much.</p> <p>8 Q. (By Mr. Cockrell) It says subject</p> <p>9 national art memo 1/24/17, what's that</p> <p>10 about?</p> <p>11 A. Should I answer the question about</p> <p>12 the thread or should I answer the question</p> <p>13 about what is this email about?</p> <p>14 Q. You know, since we've got the</p> <p>15 document in, let's just start at the</p> <p>16 beginning of the document.</p> <p>17 And so just hold up on the thread</p> <p>18 and I'll get to it in a minute, but it</p> <p>19 says subject, national art memo 1/24/17,</p> <p>20 what does that mean?</p> <p>21 A. It would mean communicating with</p> <p>22 the art department about stories that the</p> <p>23 national desk, which was the team I worked</p>	<p>1 on, had coming up to alert the art</p> <p>2 department that these were potential</p> <p>3 stories that we should be talking about --</p> <p>4 that the art department should be aware</p> <p>5 of.</p> <p>6 Q. On number three, it says going to</p> <p>7 start a thread about this later this week</p> <p>8 since Katie is still figuring out who the</p> <p>9 main people are in the story and what the</p> <p>10 angle is, so what would he do to start a</p> <p>11 thread about it?</p> <p>12 A. So based on looking at this</p> <p>13 document, to my best recollection at the</p> <p>14 time it would either be an email or</p> <p>15 perhaps a chat on a different platform,</p> <p>16 like say, Slack, to talk more about -- to</p> <p>17 talk more about a story, since, as he</p> <p>18 said, since Katie -- yes.</p> <p>19 Q. Would that be where all you guys</p> <p>20 could talk together about it on this</p> <p>21 thread? Or Katie could talk to him? I'm</p> <p>22 just trying to figure out the purpose of</p> <p>23 it.</p>
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<p>1 A. Totally. I can't recall who --</p> <p>2 exactly who would have been on a thread.</p> <p>3 To my recollection, normally it will be</p> <p>4 editors talking to the photo editor and</p> <p>5 that's my recollection.</p> <p>6 Q. Okay. Have you ever been to</p> <p>7 Alabama?</p> <p>8 MS. STROM: Objection. I</p> <p>9 believe asked and answered, but go ahead.</p> <p>10 MR. COCKRELL: No, I asked</p> <p>11 if she had any relatives here, but I don't</p> <p>12 think I've asked her if she lived here.</p> <p>13 MS. STROM: My apologies.</p> <p>14 MR. COCKRELL: That's okay.</p> <p>15 A. No, I did not.</p> <p>16 Q. So you've never been to the state</p> <p>17 of Alabama?</p> <p>18 A. Not to my recollection, no.</p> <p>19 Q. And certainly not for this story?</p> <p>20 A. No. For this story so it's</p> <p>21 typical for reporters to be the one to</p> <p>22 travel, so I know Katie traveled to</p> <p>23 Alabama.</p>	<p>1 As an editor, I don't -- I don't</p> <p>2 travel for stories. The reporter travels</p> <p>3 and then the editor stays back in the</p> <p>4 office.</p> <p>5 Q. When you contact -- I'm going to</p> <p>6 call him Dennis because I'm having trouble</p> <p>7 with his last name, but when you contact</p> <p>8 him, what part -- I know he does the art.</p> <p>9 Does he -- how does he gather the art for</p> <p>10 a story?</p> <p>11 A. It depends usually, this is dated</p> <p>12 January 25th, so it still would have been</p> <p>13 a very early stage in the story.</p> <p>14 Normally the relationships starts</p> <p>15 by telling the art director a little</p> <p>16 generally about saying who -- you know, a</p> <p>17 little general information about the</p> <p>18 story.</p> <p>19 And then as time goes on and as</p> <p>20 the story develops through reporting the</p> <p>21 team works together to figure out what art</p> <p>22 would be included or commissioned for a</p> <p>23 story.</p>

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<p style="text-align: right;">Page 161</p> <p>1 Q. Does he play a part in making that</p> <p>2 decision, what art is put in the story?</p> <p>3 MS. STROM: Did you say did</p> <p>4 he make it -- does he make a decision?</p> <p>5 MR. COCKRELL: Yeah.</p> <p>6 MS. STROM: Okay, sorry.</p> <p>7 A. I don't know specifically what</p> <p>8 decisions he makes on this or any story,</p> <p>9 but I do know that he as in this email is</p> <p>10 part of the -- is part of the discussion.</p> <p>11 So, for instance, if we were</p> <p>12 writing a story that was an interview with</p> <p>13 a pop star, he might say hey let's set up</p> <p>14 a picture, let's set up a photo shoot with</p> <p>15 the pop star, to throw one hypothetical,</p> <p>16 so like he's involved in the conversation,</p> <p>17 yes.</p> <p>18 Q. (By Mr. Cockrell) And he would</p> <p>19 throw out ideas of how to put the art in</p> <p>20 the story as part of the team?</p> <p>21 A. As the art director, and he or</p> <p>22 someone else who's in that department</p> <p>23 could speak better to the job, but my</p>	<p style="text-align: right;">Page 162</p> <p>1 understanding is through working with art</p> <p>2 directors is that it's their job to help</p> <p>3 come up with what photos or art that would</p> <p>4 make sense in the story and then they work</p> <p>5 with the editors to finalize those</p> <p>6 decisions.</p> <p>7 Q. Did you personally ever have a</p> <p>8 phone call or a conference with the</p> <p>9 Rondinis, Mr. and Mrs. Rondini, Megan's</p> <p>10 parents?</p> <p>11 A. To my recollection, no.</p> <p>12 MR. COCKRELL: We would</p> <p>13 offer Plaintiff's Exhibit 45.</p> <p>14 Q. Let's see here. Was Katie working</p> <p>15 on any other stories other than the</p> <p>16 Rondini story?</p> <p>17 A. I can't remember if she was</p> <p>18 working on any other stories. I do know</p> <p>19 that often reporters are working on</p> <p>20 multiple stories at once.</p> <p>21 Q. You weren't working on one with</p> <p>22 her, right, during that time period other</p> <p>23 than this story?</p>
<p style="text-align: right;">Page 163</p> <p>1 A. I can't remember. If she had been</p> <p>2 working on multiple stories, I was on her</p> <p>3 same team so it really -- the answer to</p> <p>4 that question depends on if she had been</p> <p>5 working on multiple stories but I can't</p> <p>6 remember.</p> <p>7 Q. In the story where did you come up</p> <p>8 with or Katie come up with or did y'all</p> <p>9 discuss that the police threatened to</p> <p>10 press felony charges against Megan?</p> <p>11 MS. STROM: I'm sorry, can</p> <p>12 you read that back to me?</p> <p>13 Q. (By Ms. Cockrell) I said who came</p> <p>14 up -- in the story it says the police</p> <p>15 threatened to press felony charges against</p> <p>16 Megan Rondini.</p> <p>17 Where did you-all come up with</p> <p>18 that?</p> <p>19 MS. STROM: Can you point me</p> <p>20 to where it says that in the article?</p> <p>21 MR. COCKRELL: I don't have</p> <p>22 the article here right in front of me</p> <p>23 right now. I'm just going to test her</p>	<p style="text-align: right;">Page 164</p> <p>1 memory on it.</p> <p>2 MS. STROM: Okay.</p> <p>3 Mischaracterizes the article.</p> <p>4 Q. (By Mr. Cockrell) Okay.</p> <p>5 A. I mean, that's my question since</p> <p>6 so much of this is really -- you know, my</p> <p>7 job is to help people refine not only big</p> <p>8 picture level but the line level, the</p> <p>9 ideas in this story, so if you could point</p> <p>10 to a specific sentence, I would probably</p> <p>11 be more able to answer that question.</p> <p>12 Q. (By Mr. Cockrell) Okay, we'll come</p> <p>13 back to that in just a minute then. I'm</p> <p>14 looking at -- I guess I just need to mark</p> <p>15 this one. Let me mark BuzzFeed 1158.</p> <p>16 COURT REPORTER: And this</p> <p>17 will be 46.</p> <p>18 (Whereupon, a document was marked</p> <p>19 as Plaintiff's Exhibit No. 46 and</p> <p>20 is attached to the original</p> <p>21 transcript.)</p> <p>22 Q. (By Mr. Cockrell) Have you got it</p> <p>23 up there? Can she read it?</p>

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<p>1 A. I can see it.</p> <p>2 Q. Was there anything wrong with the</p> <p>3 Homicide Unit reading Megan her rights?</p> <p>4 MS. STROM: Objection, but</p> <p>5 you can answer, Marisa.</p> <p>6 Q. (By Mr. Cockrell) When I say</p> <p>7 rights, her Miranda warning.</p> <p>8 A. I'm not a trained police officer</p> <p>9 so I really couldn't say -- I couldn't</p> <p>10 weigh in on that.</p> <p>11 Q. Did anybody at BuzzFeed when y'all</p> <p>12 were compiling the story ever speak with</p> <p>13 an expert in, you know, in law enforcement</p> <p>14 to ask them that question?</p> <p>15 A. My understanding is that Katie did</p> <p>16 over her years reporting she had spoken</p> <p>17 with experts, that's even prior to the</p> <p>18 story, but, then, yes, while reporting</p> <p>19 this story she spoke to experts and she</p> <p>20 also importantly spoke to the experts</p> <p>21 within the Tuscaloosa department</p> <p>22 themselves.</p> <p>23 She reached out to those experts</p>	<p>1 who are essential, so say Gary Hood, for</p> <p>2 instance.</p> <p>3 Q. Did she ask them at any point that</p> <p>4 you know of or did you or anybody else</p> <p>5 that was in on the BuzzFeed story what --</p> <p>6 why they gave her Miranda warning?</p> <p>7 A. I can't remember specifically.</p> <p>8 Q. Do you know what the Miranda</p> <p>9 warning is?</p> <p>10 A. I don't want to ask you a</p> <p>11 question, but I would appreciate if you</p> <p>12 could specify and explain to me what it is</p> <p>13 you mean.</p> <p>14 Q. Well, when you read someone their</p> <p>15 rights about the right to remain silent,</p> <p>16 right to have an attorney present, are you</p> <p>17 familiar with that?</p> <p>18 A. I am familiar. So I just want to</p> <p>19 make sure that we're talking about the</p> <p>20 same thing.</p> <p>21 Q. Do you know who that -- who that</p> <p>22 protects by making law enforcement give a</p> <p>23 Miranda warning?</p>
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<p>1 MS. STROM: Objection.</p> <p>2 But you can answer, Marisa.</p> <p>3 A. I don't know -- I don't want to</p> <p>4 wager a guess.</p> <p>5 Q. (By Mr. Cockrell) Do you know for</p> <p>6 whose benefit it is that a Miranda warning</p> <p>7 is given to a potential suspect before</p> <p>8 they give a statement?</p> <p>9 A. I don't think I'm in the position</p> <p>10 to know, I'm sorry.</p> <p>11 Q. I know Katie has done quite a few</p> <p>12 sexual assault cases as you've told me and</p> <p>13 rape cases as far as the stories go, do</p> <p>14 you know specifically whether or not she</p> <p>15 spoke with a police expert to get advice</p> <p>16 on this story before it was published?</p> <p>17 MS. STROM: Objection.</p> <p>18 Asked and answered.</p> <p>19 You can go ahead, Marisa.</p> <p>20 A. My recollection is that Katie</p> <p>21 spoke -- has, you know -- the most</p> <p>22 important police expert that Katie spoke</p> <p>23 to or reached out to were the people who</p>	<p>1 were referenced in the story.</p> <p>2 I believe she spoke to -- she</p> <p>3 reached out to other experts during the</p> <p>4 time reporting, but I don't recall</p> <p>5 specifically who those -- who that might</p> <p>6 be.</p> <p>7 Q. (By Mr. Cockrell) That's something</p> <p>8 she would best know?</p> <p>9 A. Yeah, that's something that I</p> <p>10 would not -- I just don't remember from</p> <p>11 four years ago that.</p> <p>12 Q. I noticed that there was a quote</p> <p>13 in the story from the National Association</p> <p>14 of Police Chiefs.</p> <p>15 Did either or Katie or anybody</p> <p>16 with BuzzFeed prior to the story being</p> <p>17 published speak with somebody with the</p> <p>18 National Association of Police Chiefs?</p> <p>19 A. I can't recall.</p> <p>20 Q. Who is Shani Hilton?</p> <p>21 A. Shani Hilton, S-h-a-n-i?</p> <p>22 Q. Yeah, who is she?</p> <p>23 A. Shani Hilton, I cannot remember</p>

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<p>1 what her title was at the time. It was  2 perhaps news director at BuzzFeed.  3 Q. Does the news director have any  4 say-so in a story that's being published?  5 MS. STROM: Objection.  6 But you can answer to the  7 extent you understand.  8 A. I don't know what Shani  9 specifically would have seen her role.  10 What I can offer is that Shani oversaw --  11 this is a better question for Tina Susman,  12 but my recollection is that Shani is  13 Tina's boss or supervisor, and Tina would  14 report to Shani.  15 Q. (By Mr. Cockrell) What is Shani's  16 job title?  17 MS. STROM: Objection.  18 Asked and answered.  19 A. Yeah, I --  20 Q. (By Mr. Cockrell) If it's news  21 director tell me --  22 A. I just don't -- it might have been  23 news director. I don't remember</p>	<p>1 specifically.  2 Q. Okay. All right.  3 Who was her boss? Who is Shani's  4 boss?  5 A. She would know better than I would  6 or he would, but I believe Ben Smith, the  7 editor-in-chief. Shani was -- I believe  8 Shani reported to Ben Smith, the  9 editor-in-chief.  10 Q. Did y'all always include Shani  11 Hilton in stories that you wanted to  12 publish?  13 A. My best recollection is that Shani  14 got a weekly update, a weekly memo, from  15 either myself or Tina and perhaps even had  16 a weekly meeting with Tina that was  17 reporting back on all stories.  18 Shani oversaw multiple departments  19 and the newsrooms so that was her -- she  20 was being updated regularly about stories.  21 Q. Okay. Do you know what  22 departments that she was over?  23 A. I think it's possible most, but I</p>
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<p>1 know -- I can definitely say it was the  2 national desk, but I can't remember who  3 else but she was the number two, one might  4 say, in the office with Ben Smith being  5 the editor-in-chief.  6 Q. Okay. Who is Maggie Schultz?  7 A. Maggie Schultz I believe was  8 Shani's assistant, who would at the time  9 handle, for instance, putting meetings on  10 Shani's calendar.  11 Q. Would you report to Shani Hilton  12 about what was going on in the BuzzFeed  13 Rondini story?  14 A. Yeah, as I said, I believe my best  15 recollection is that I would send what  16 might have been a weekly email updating  17 Shani on all the stories that our team was  18 working on and this would have been one of  19 those stories.  20 Q. Okay. All right. I'm reading an  21 email from to Katie Baker and it says  22 Marisa Carroll, I don't know if Katie  23 wrote it to you or you wrote it to Katie,</p>	<p>1 but it says this could be a good spot to  2 describe what the town feels like.  3 Do you remember that email?  4 MS. STROM: Objection. To  5 the extent you're going to be asking  6 specific emails, can you mark it so we can  7 see the contents?  8 MR. COCKRELL: Yeah, I can.  9 I can. What number are we on?  10 COURT REPORTER: It's going  11 to be 47.  12 (Whereupon, a document was marked  13 as Plaintiff's Exhibit No. 47 and  14 is attached to the original  15 transcript.)  16 Q. (By Mr. Cockrell) It is BuzzFeed  17 2164.  18 Marisa, can you see that?  19 A. Sorry, I'm reading it now.  20 Q. That's okay. Let me know when  21 you're done.  22 A. I read it.  23 Q. Okay. It says -- whose words are</p>

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<p style="text-align: right;">Page 173</p> <p>1 these? I think they're yours, but I want</p> <p>2 to make sure.</p> <p>3 It says Bunn, and it says this</p> <p>4 could be a good spot to describe what the</p> <p>5 town feels like, what does it look like,</p> <p>6 what did you observe there when you walk</p> <p>7 around, does everyone know the family</p> <p>8 name, et cetera.</p> <p>9 You have such details proving that</p> <p>10 the family is very influential, important</p> <p>11 so you can use some description here to</p> <p>12 play on the southern gothic of it all. Is</p> <p>13 that your --</p> <p>14 MS. STROM: Objection to the</p> <p>15 extent that Bunn and the rest of it might</p> <p>16 come from different people, but, Marisa,</p> <p>17 you can answer the rest.</p> <p>18 Q. (By Mr. Cockrell) The question is</p> <p>19 what do you mean by southern gothic of it</p> <p>20 all?</p> <p>21 A. Well, I know that southern gothic</p> <p>22 isn't something that we end up describing</p> <p>23 in the article, so my read is that this is</p>	<p style="text-align: right;">Page 174</p> <p>1 -- I'm asking Katie as someone who's been</p> <p>2 there, as I said before I had never been</p> <p>3 to Tuscaloosa.</p> <p>4 So I'm asking Katie to describe</p> <p>5 what it is -- what it is like in the town</p> <p>6 that she had visited multiple times to</p> <p>7 report this story.</p> <p>8 Q. So what do you mean by play up to</p> <p>9 the southern gothic of it all? What did</p> <p>10 you mean when you said that?</p> <p>11 MS. STROM: I believe that</p> <p>12 was just asked and answered, but go ahead.</p> <p>13 MR. COCKRELL: I didn't see</p> <p>14 it as a correct response.</p> <p>15 A. My question to her is about -- I'm</p> <p>16 asking her what she saw there.</p> <p>17 In the process of editing a story,</p> <p>18 this is I believe in February, so right,</p> <p>19 you know, four or five months before this</p> <p>20 story was published, my job as an editor</p> <p>21 is to ask her questions and have her</p> <p>22 respond and either incorporate or not the</p> <p>23 ideas that I'm asking her about, so I was</p>
<p style="text-align: right;">Page 175</p> <p>1 asking her to describe what the town feels</p> <p>2 like.</p> <p>3 Q. And what is your definition of</p> <p>4 southern gothic?</p> <p>5 A. I've got to say I honestly don't</p> <p>6 -- I don't remember what I would mean</p> <p>7 there, just judging by the context clues</p> <p>8 and by details that did up end in the</p> <p>9 story describing say what the campus looks</p> <p>10 like, this is this elegant campus where</p> <p>11 she is sort of giving us a feel for what</p> <p>12 it looks like on the campus.</p> <p>13 Q. All right. Thank you.</p> <p>14 Excuse me a second. I'm going</p> <p>15 through the production of documents and</p> <p>16 I've got the ones regarding you, but I</p> <p>17 want to make sure what I want to ask you</p> <p>18 about it.</p> <p>19 Why was it important to you that</p> <p>20 you put in an email that he's killed the</p> <p>21 African Big Five. Why is that relevant to</p> <p>22 the story?</p> <p>23 MS. STROM: I'm sorry, what?</p>	<p style="text-align: right;">Page 176</p> <p>1 Q. (By Mr. Cockrell) He killed the</p> <p>2 African Big Five. Why is that relevant to</p> <p>3 the story?</p> <p>4 A. Would it be possible to see the</p> <p>5 email you're talking about?</p> <p>6 Q. Yeah, sure. No problem. Can I</p> <p>7 just show it to you? I don't really want</p> <p>8 to introduce it.</p> <p>9 Scotch, pull up 2168. I'm just</p> <p>10 going to ask her about it.</p> <p>11 COURT REPORTER: So you</p> <p>12 didn't want to introduce it?</p> <p>13 MR. COCKRELL: No, she can</p> <p>14 read it.</p> <p>15 A. I read it.</p> <p>16 Q. Why as that important? What did</p> <p>17 that add to the story when you put in he's</p> <p>18 even killed the African Big Five?</p> <p>19 MS. STROM: Objection to the</p> <p>20 extent that that's assuming that Marisa</p> <p>21 put that in the story, but you can answer.</p> <p>22 Q. (By Mr. Cockrell) Well, I'm just</p> <p>23 reading. It says Marisa Carroll. He's</p>

<p style="text-align: right;">Page 177</p> <p>1 even killed the African Big Five and</p> <p>2 then --</p> <p>3 MS. STROM: Right, objection</p> <p>4 to the extent these are not emails. These</p> <p>5 are Google comments and they don't work</p> <p>6 that way.</p> <p>7 But, Marisa, to the extent</p> <p>8 you believe those are words you put in,</p> <p>9 you can address that.</p> <p>10 Q. (By Mr. Cockrell) To the extent as</p> <p>11 editor of this story, the Rondini story,</p> <p>12 why was it important to put in he had</p> <p>13 killed the African Big Five?</p> <p>14 MS. STROM: Objection, but</p> <p>15 you can answer. You can answer, Marisa.</p> <p>16 A. I would say that I'm -- in this</p> <p>17 note I believe that I wrote the question</p> <p>18 that follows asking did he bring them</p> <p>19 home.</p> <p>20 For me, I was asking her</p> <p>21 information similar to your question, so</p> <p>22 I'm asking more information. It's a</p> <p>23 request for further information to help</p>	<p style="text-align: right;">Page 178</p> <p>1 understand what she's talking about.</p> <p>2 My -- it looks as though Katie</p> <p>3 wrote that comment. That was from the</p> <p>4 documents, someone wrote that in the</p> <p>5 document, he's killed the African Big</p> <p>6 Five, and this is a Google response and me</p> <p>7 asking a question about it.</p> <p>8 Q. (By Mr. Cockrell) And, you know,</p> <p>9 if it made the story, which I think it</p> <p>10 did, would that have been something you</p> <p>11 would have approved to go into the story?</p> <p>12 A. So the way that my role worked in</p> <p>13 the story was I didn't have one-off</p> <p>14 approval of details.</p> <p>15 It was a collective effort where</p> <p>16 Tina Susman as the boss has the ultimate</p> <p>17 say of approval and then Sharmila would</p> <p>18 also review the facts to try to make sure</p> <p>19 that everything was accurate.</p> <p>20 So I can't say that I would have</p> <p>21 approved every line in the story. I would</p> <p>22 have reviewed it. I would have read the</p> <p>23 story and reviewed every line in the story</p>
<p style="text-align: right;">Page 179</p> <p>1 but I don't think that I would have final</p> <p>2 approval.</p> <p>3 Q. What, if anything, did it add to</p> <p>4 the story?</p> <p>5 A. The story describes his home so</p> <p>6 that's why I -- I can't go back in time</p> <p>7 and think why I would ask that, but</p> <p>8 specifically I asked was it in his home.</p> <p>9 So I think it would be relevant to</p> <p>10 where -- to his home and to make sure we</p> <p>11 were accurate in describing his home.</p> <p>12 Q. Did you see the Snapchat photos</p> <p>13 from his home of the animals that Megan</p> <p>14 had on her cell phone?</p> <p>15 A. I can't remember whether or not I</p> <p>16 did.</p> <p>17 MR. COCKRELL: I guess I'm</p> <p>18 going to mark this next one as 48, and it</p> <p>19 is BuzzFeed 2528, Scotch.</p> <p>20 MR. RITCHEY: 2528?</p> <p>21 MR. COCKRELL: Yes.</p> <p>22 (Whereupon, a document was marked</p> <p>23 as Plaintiff's Exhibit No. 48 and</p>	<p style="text-align: right;">Page 180</p> <p>1 is attached to the original</p> <p>2 transcript.)</p> <p>3 Q. Have you seen it, Marisa?</p> <p>4 A. Yes, I have.</p> <p>5 Q. Plaintiff's Exhibit 48. Is that</p> <p>6 your email?</p> <p>7 A. No, this looks like Google</p> <p>8 Documents comment.</p> <p>9 Q. Now, when you say Google Doc</p> <p>10 comments what do you mean by that?</p> <p>11 A. They're comments that would have</p> <p>12 been left in a Google Document, so rather</p> <p>13 than a direct back and forth email,</p> <p>14 they're comments from the Google Document.</p> <p>15 Q. Okay. So is everybody</p> <p>16 contributing to this Google Document</p> <p>17 that's on it?</p> <p>18 A. Does it say what the name of the</p> <p>19 Google document -- I don't know what the</p> <p>20 name of the Google document is.</p> <p>21 Q. I'm looking at it. You're seeing</p> <p>22 what I'm seeing, so I don't see -- I don't</p> <p>23 see anything that says Google document.</p>

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<p>1 MS. STROM: I'll represent 2 that all of these Google replies are 3 comments that go to all the different 4 drafts of the story, so you can see what 5 comment is referring to what part of a 6 specific draft. 7 So here it's hard to tell 8 what draft this is referring to, but 9 that's how they work. The comments 10 correspond to the drafts. 11 MR. COCKRELL: Thank you. I 12 was trying to figure that out. 13 Q. So these are comments of your 14 group, your national group, back and forth 15 with each other on the article; is that 16 right, Marisa? 17 A. So I can't know for sure without 18 knowing what document it corresponds to, 19 but normally this would be a draft of the 20 story so these are comments for the people 21 who are shared on it commenting on the 22 story. 23 Q. Okay. And it is true that all</p>	<p>1 states -- states have different rape laws 2 and sexual assault laws; is that correct? 3 A. I can't speak to what's true in 4 2021, but I do know different states have 5 different laws in general. 6 Q. And did you make the comment there 7 Alabama should remove the use of force 8 requirement from its rape laws as states 9 including Maryland are working toward? 10 A. That's a suggestion for how -- I 11 believe that is a suggestion for how she 12 might -- because the following comment is 13 or something. 14 I would like for it to be broader 15 and explaining so this is -- this is a 16 suggestion for how one might rephrase a 17 sentence is my recollection, but I'd know 18 more if I saw, for instance, the 19 paragraph. 20 I also don't know like what month 21 -- we went through very many drafts of 22 this story, so I just don't know when it's 23 from.</p>
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<p>1 Q. Do you know of any state at that 2 time period had removed the use of force 3 as a requirement to have a charge of rape 4 or assault against somebody, sexual 5 assault against somebody? 6 A. According to the sentence I wrote 7 here I can't -- I don't remember. I can 8 say in this sentence I wrote here it says 9 that Maryland was working toward that 10 policy, but, again, this isn't -- this 11 isn't my -- this is me suggesting a 12 different way to phrase the line that was 13 in the story. 14 This is an editing, line editing 15 with that I say or something. 16 Q. Did you research that before you 17 sent that suggestion? Of what the laws 18 were in different states with regard to 19 rape and sexual assault and the use of 20 force requirement? 21 A. In the process of editing the 22 story everyone involved in this story, 23 including myself, had many conversations</p>	<p>1 about what rape laws were in different 2 states. 3 And this is not a story about, 4 about rape laws in states across the 5 country. 6 This is a story about Megan 7 Rondini and how she felt it personally 8 failed to the point where she ended up 9 committing suicide by various 10 institutions, but I can say that, yes, I 11 know everyone on my team, Katie first and 12 foremost as a reporter, was reviewing 13 information about rape laws in different 14 states, so anything that ran in the story 15 was then ultimately fact checked by 16 Sharmila. 17 Q. And isn't it true that Josh 18 Hastings and Adam Jones, the 19 investigators, had to follow the existing 20 law in the state of Alabama in the Rondini 21 case? 22 MS. STROM: Objection. But 23 to the extent you can answer, Marisa,</p>

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<p>1 please do.</p> <p>2 A. I mean, I'm not -- again, I'm not</p> <p>3 a police officer. I've never been through</p> <p>4 that kind of training, so I can't speak to</p> <p>5 what an officer should or should not have</p> <p>6 done.</p> <p>7 I'll say that I don't think the</p> <p>8 story reflects that they should have done</p> <p>9 one thing or another. The story as I read</p> <p>10 it isn't about that.</p> <p>11 Q. (By Mr. Cockrell) What is it</p> <p>12 about?</p> <p>13 A. The story, as I read it, is about</p> <p>14 Megan Rondini, a young woman who said that</p> <p>15 she believed she was raped, and by the end</p> <p>16 of that process she felt like she had been</p> <p>17 failed by many institutions and ultimately</p> <p>18 committed suicide.</p> <p>19 Q. Did you believe that the</p> <p>20 investigators had failed Megan Rondini?</p> <p>21 MS. STROM: Objection.</p> <p>22 You can answer, Marisa.</p> <p>23 A. I didn't think -- I don't think</p>	<p>1 that's what the story is about. I don't</p> <p>2 think that's what the published story says</p> <p>3 or is about.</p> <p>4 Q. (By Mr. Cockrell) That's not</p> <p>5 answering my question.</p> <p>6 Did you feel that the</p> <p>7 investigators failed Megan Rondini?</p> <p>8 MS. STROM: Objection to the</p> <p>9 extent you're asking about the published</p> <p>10 story and she's saying the story doesn't</p> <p>11 say that one way or the other.</p> <p>12 But, Marisa, you can answer.</p> <p>13 A. I mean, again, I've never -- I</p> <p>14 didn't -- that's just not what I said or</p> <p>15 what I encountered through the reporting</p> <p>16 of this story is about who failed Megan</p> <p>17 Rondini.</p> <p>18 This is -- I mean to me really the</p> <p>19 story and my job in the story is</p> <p>20 presenting facts of interest to the public</p> <p>21 and relevance to the public so that the</p> <p>22 people reading the story can make</p> <p>23 decisions.</p>
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<p>1 Q. (By Mr. Cockrell) Can you name one</p> <p>2 thing or anything that Josh Hastings and</p> <p>3 Adam Jones did to fail Megan Rondini in</p> <p>4 their investigation of her case?</p> <p>5 MS. STROM: Objection.</p> <p>6 As she's already stated, the</p> <p>7 article doesn't say that Hastings or Jones</p> <p>8 failed anyone, but to the extent you want</p> <p>9 to answer -- you can answer that question,</p> <p>10 you may do so.</p> <p>11 A. I would say that the story doesn't</p> <p>12 say that they failed, and, you know, more</p> <p>13 importantly for me, I'm not their</p> <p>14 supervisor.</p> <p>15 I'm not a fellow member of that</p> <p>16 force. I can't adjudicate what their</p> <p>17 performance was like on their job. That's</p> <p>18 just not something I handle or have done.</p> <p>19 Q. (By Mr. Cockrell) And I guess it's</p> <p>20 fair to say you never knew or asked what</p> <p>21 the homicide department policy was with</p> <p>22 regard to investigating rapes and sexual</p> <p>23 assaults; is that true?</p>	<p>1 A. My understanding is that Katie</p> <p>2 repeatedly asked multiple people in the</p> <p>3 department about this story for their side</p> <p>4 of the story, much of which is published</p> <p>5 in the final article.</p> <p>6 Not everyone responded to our</p> <p>7 request for comment, but there was a great</p> <p>8 effort to understand all sides and to</p> <p>9 present that information to the public.</p> <p>10 Q. And that's your opinion?</p> <p>11 MS. STROM: Objection.</p> <p>12 A. I see that -- I'm speaking</p> <p>13 truthfully on record and that's my truth</p> <p>14 on the record.</p> <p>15 Q. (By Mr. Cockrell) Okay, I accept</p> <p>16 that.</p> <p>17 Okay. We would offer Plaintiff's</p> <p>18 Exhibit 48.</p> <p>19 I read in one of the emails where</p> <p>20 it says Katie said that she wanted to</p> <p>21 release the story when students and</p> <p>22 faculty were on campus. Do you remember</p> <p>23 that?</p>

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<p>1 MS. STROM: Objection.</p> <p>2 To the extent you're talking</p> <p>3 about a specific email, you should show it</p> <p>4 but --</p> <p>5 Q. (By Mr. Cockrell) Plaintiff's</p> <p>6 Exhibit 49, it is 2570.</p> <p>7 MR. RITCHEY: 2570?</p> <p>8 MR. COCKRELL: Yes.</p> <p>9 (Whereupon, a document was marked</p> <p>10 as Plaintiff's Exhibit No. 49 and</p> <p>11 is attached to the original</p> <p>12 transcript.)</p> <p>13 Q. Can you see it?</p> <p>14 A. I can see that. Thank you.</p> <p>15 Q. Okay. Let me know when you're</p> <p>16 ready.</p> <p>17 A. I'm ready.</p> <p>18 Can you please repeat the</p> <p>19 question? I'd appreciate it.</p> <p>20 Q. Sure. I'm just going to do it a</p> <p>21 little bit different.</p> <p>22 I'm going to read this. It says</p> <p>23 Katie, wrapping up University of Alabama</p>	<p>1 story, it's almost done but we're going to</p> <p>2 hold until March 21st because students are</p> <p>3 about to go on Spring Break.</p> <p>4 In my and Katie's experience you</p> <p>5 want students and staff to be on campus</p> <p>6 when a story like this drops.</p> <p>7 Does that -- that was from you to</p> <p>8 her -- excuse me, to Shani Hilton. Is</p> <p>9 that your words in that email?</p> <p>10 A. Correct, that looks like me</p> <p>11 telling that to Shani, yes.</p> <p>12 Q. And why is that? Why did -- why</p> <p>13 was it important that students and</p> <p>14 faculty, staff be on campus when the story</p> <p>15 drops?</p> <p>16 A. Because we do stories that are of</p> <p>17 the public interest, so if this is a story</p> <p>18 that in large part is about what went down</p> <p>19 at the University of Alabama about one</p> <p>20 young woman's story that took place at the</p> <p>21 University of Alabama, we would want to</p> <p>22 publish it when people who it matters to,</p> <p>23 including people at the University of</p>
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<p>1 Alabama, would be there the read it.</p> <p>2 Q. So increase your readership, is</p> <p>3 that why?</p> <p>4 MS. STROM: Objection.</p> <p>5 Asked and answered but go,</p> <p>6 ahead Marisa.</p> <p>7 A. For me it's about reaching people</p> <p>8 for whom this story is in the public</p> <p>9 interest of.</p> <p>10 So if you're, you know, writing a</p> <p>11 story about a college, it's relevant to</p> <p>12 people who go to that college, for</p> <p>13 instance.</p> <p>14 Q. (By Mr. Cockrell) Do you know</p> <p>15 whether or not Katie was investigating</p> <p>16 another alleged rape or sexual assault at</p> <p>17 the time of this Rondini case in</p> <p>18 Tuscaloosa?</p> <p>19 A. I can't remember.</p> <p>20 MR. COCKRELL: Offer 49.</p> <p>21 (Whereupon, a document was marked</p> <p>22 as Plaintiff's Exhibit No. 50 and</p> <p>23 is attached to the original</p>	<p>1 transcript.)</p> <p>2 Q. Let me show you Plaintiff's</p> <p>3 Exhibit 50.</p> <p>4 2620, Scotch?</p> <p>5 Let me know when you've got it.</p> <p>6 A. I see it.</p> <p>7 Q. Okay. In her it says -- it's an</p> <p>8 email from you and it's to Sharmila,</p> <p>9 subject Rondini draft, February 16th.</p> <p>10 And it says Katie Baker, including</p> <p>11 Tuscaloosa, let's talk about the wording</p> <p>12 today please. Katie Baker, what if we</p> <p>13 just don't implicate Tuscaloosa. Do you</p> <p>14 know what she meant by that?</p> <p>15 MS. STROM: Objection. This</p> <p>16 is not an email.</p> <p>17 This is a Google comment as</p> <p>18 we've discussed before, and objection,</p> <p>19 without the full draft that it's</p> <p>20 responding to, it's hard to understand the</p> <p>21 context.</p> <p>22 But if you can understand,</p> <p>23 Marisa, please go ahead.</p>

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<p style="text-align: right;">Page 193</p> <p>1 A. My answer to the question is I</p> <p>2 really don't -- I don't know what this is</p> <p>3 about or what she would have been talking</p> <p>4 about.</p> <p>5 Q. (By Mr. Cockrell) It says, from</p> <p>6 you, why, I'm happy to discuss this in</p> <p>7 person Wednesday if easier.</p> <p>8 Do you remember having a</p> <p>9 conversation with her about whether to</p> <p>10 implicate Tuscaloosa or not?</p> <p>11 MS. STROM: Whether to what</p> <p>12 Tuscaloosa? Sorry.</p> <p>13 Q. (By Mr. Cockrell) To implicate</p> <p>14 Tuscaloosa or not.</p> <p>15 MS. STROM: Objection to the</p> <p>16 extent she just says she doesn't recall</p> <p>17 this, but go ahead, Marisa.</p> <p>18 A. Yeah, I don't know even what is</p> <p>19 meant by implicate Tuscaloosa.</p> <p>20 I just really don't remember -- I</p> <p>21 don't understand this document or remember</p> <p>22 something that would help me understand</p> <p>23 what this is or what the conversation</p>	<p style="text-align: right;">Page 194</p> <p>1 would have been.</p> <p>2 Q. (By Mr. Cockrell) You said why,</p> <p>3 but you don't remember any -- when she</p> <p>4 said should we leave out -- what if we</p> <p>5 just don't implicate Tuscaloosa and your</p> <p>6 response was why, but you don't remember</p> <p>7 any of that; is that correct?</p> <p>8 A. Yes. And I also don't even</p> <p>9 understand what the sentence that we're</p> <p>10 talking about is.</p> <p>11 Like I said, the way that is --</p> <p>12 that the Google Doc works I don't know</p> <p>13 enough of the context that might help me</p> <p>14 understand, but I also don't remember</p> <p>15 having a meeting.</p> <p>16 Q. Yeah, I'm just -- I'm asking you</p> <p>17 questions off of what was produced to us</p> <p>18 in discovery, so if there's more -- you</p> <p>19 think there would be more that would</p> <p>20 explain that?</p> <p>21 MS. STROM: Objection, and I</p> <p>22 will represent that we've produced all the</p> <p>23 drafts, so this would correspond to a</p>
<p style="text-align: right;">Page 195</p> <p>1 draft, but go ahead, Marisa.</p> <p>2 A. Yeah, that's all I'm saying these</p> <p>3 are -- so this is the comments that would</p> <p>4 be in a Google Doc, so normally what would</p> <p>5 happen is someone highlights a word in a</p> <p>6 Google Doc and ask a question so that's</p> <p>7 how I would know more.</p> <p>8 Q. (By Mr. Cockrell) So you would</p> <p>9 have to know more to be able to answer my</p> <p>10 question; is that correct? You have to</p> <p>11 see more?</p> <p>12 A. It might help if I knew more. I</p> <p>13 can't guarantee that I would know what I</p> <p>14 meant by why in February 2017 or whatever</p> <p>15 at the time, but I would -- yeah.</p> <p>16 Q. That's fair.</p> <p>17 A. I can say for sure I don't</p> <p>18 understand right now.</p> <p>19 Q. Okay, thank you.</p> <p>20 Plaintiff's Exhibit 51.</p> <p>21 (Whereupon, a document was marked</p> <p>22 as Plaintiff's Exhibit No. 51 and</p> <p>23 is attached to the original</p>	<p style="text-align: right;">Page 196</p> <p>1 transcript.)</p> <p>2 Q. It is BuzzFeed 2527.</p> <p>3 MS. BOLGER: This is 51?</p> <p>4 MR. COCKRELL: Yes.</p> <p>5 Q. Let me know when you've had a</p> <p>6 chance to look over it.</p> <p>7 A. May the person whose screen this</p> <p>8 is please push the zoom in button once or</p> <p>9 twice? I appreciate it.</p> <p>10 MS. STROM: And for just my</p> <p>11 benefit, could someone scroll down so we</p> <p>12 can read the whole document?</p> <p>13 MR. RITCHEY: Tell me when</p> <p>14 y'all are ready to scroll because I don't</p> <p>15 think it will fit on the whole screen at</p> <p>16 one time.</p> <p>17 MS. STROM: Marisa, you do</p> <p>18 the leading, let him know.</p> <p>19 MR. RITCHEY: Just let me</p> <p>20 know and I'll try to do that.</p> <p>21 A. I'm ready for you to scroll please</p> <p>22 thank you. Appreciate it.</p> <p>23 Great, I read it.</p>

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<p>1 Q. (By Mr. Cockrell) And you said in 2 here that the story is -- let's read it 3 right here what you've got. 4 This is more Google Docs; is that 5 correct? 6 A. This is more Google Docs, yes. 7 Q. And it's where you're making 8 recommendations or responding to 9 recommendations of others; is that 10 correct? 11 A. And oftentimes asking questions. 12 So asking, really interrogating the writer 13 or other people involved in the story so 14 that we can best understand the story and 15 how to communicate the information, yes. 16 Q. When you said right here, that 17 this seems like the right note, appreciate 18 that this story is very explicit and 19 pointing to institutional problems, 20 failures, and what can be done to fix them 21 instead of just reading like a sad 22 narrative about these poor women. 23 You said these poor women. Who</p>	<p>1 are you talking about there? 2 A. I believe that I mean women who -- 3 first of all, I'm speaking generally, so 4 when I say sad narrative about these poor 5 women, I mean, like wah, wah, like a sad 6 sack story, and I think I was speaking 7 specifically to women who attend 8 University of Alabama. 9 Q. Do you know of anybody else at the 10 University of Alabama, any other woman, 11 that's alleged sexual assault or rape that 12 you've interviewed or know of Katie 13 interviewing? 14 A. I know in the published story it 15 describes 27 women, I believe is the 16 number, and this is not a -- but I don't 17 -- I definitely couldn't say that I know a 18 specific say another woman. 19 But I do -- yeah, I know that we 20 referenced other women who attend the 21 University of Alabama in the story, so 22 that's where I'm pointing to, but I can't 23 -- I couldn't -- I guess that's my answer</p>
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<p>1 is I don't know, except I know upon 2 re-reading the story that it mentions that 3 other women had brought sexual assault 4 complaints to the University of Alabama. 5 Q. Had you ever talked to anybody 6 that brought a sexual assault complaint or 7 talked to or did Katie or anybody else 8 that you know of of a lady that accused 9 T. J. Bunn of sexual assault other than 10 Katie, other than Megan -- 11 MS. STROM: Sorry, go ahead, 12 Bob, finish. If you're finished, then 13 objection. 14 And, Marisa, to the extent 15 that this is going to reveal the identity 16 of a confidential source, do not answer 17 it. 18 But to the extent you can 19 answer this question without revealing the 20 identity of a confidential source, you may 21 do so. 22 A. I have to answer the first part of 23 the question, no, I never spoke to and I</p>	<p>1 also, you know, she had passed, but I 2 never spoke to Megan Rondini. 3 Usually it's extremely rare for an 4 editor to be having conversations with 5 sources in stories. That's for the 6 reporter, the reporter to do. 7 So the second part, would you 8 please repeat the second part of your 9 question? Thank you. 10 Q. (By Mr. Cockrell) The second part 11 was do you know if Katie spoke with 12 another person who accused T. J. Bunn of 13 rape or sexual assault? 14 MS. STROM: Same objection. 15 A. To my recollection I don't 16 remember the details. I don't remember 17 the details, but I do -- what I do recall 18 is that there was another source 19 completely unrelated to Megan Rondini who 20 we ended up not including -- we mutually 21 agreed not to include her in the story. 22 My memory of the situation is that 23 she was worried about retaliation from</p>

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<p>1 Mr. Bunn, and as a result we came as a</p> <p>2 news institution, our team at BuzzFeed and</p> <p>3 the person, agreed not to include her in</p> <p>4 the story.</p> <p>5 Q. (By Mr. Cockrell) Is there any</p> <p>6 other reason you-all decided not to</p> <p>7 include her in the story?</p> <p>8 MS. STROM: Objection.</p> <p>9 You can answer.</p> <p>10 A. The same reason I described, if</p> <p>11 not, you know -- so I would say, you know,</p> <p>12 no, that's my answer.</p> <p>13 Q. (By Mr. Cockrell) Okay. All</p> <p>14 right.</p> <p>15 MS. STROM: Bob, if you're</p> <p>16 going to go to a different topic, maybe we</p> <p>17 could take a break soon.</p> <p>18 MR. COCKRELL: Yeah, we will</p> <p>19 pretty quick. Let me get through this</p> <p>20 real quick.</p> <p>21 Q. It says you talked about</p> <p>22 institutional problems or failures. What</p> <p>23 institutional problems or failures are</p>	<p>1 y'all saying that happened in Tuscaloosa</p> <p>2 in the Megan Rondini case?</p> <p>3 MS. STROM: Objection, to</p> <p>4 the extent that that mischaracterizes this</p> <p>5 Google Doc and the article.</p> <p>6 But go ahead, Marisa.</p> <p>7 A. To the best of my recollection</p> <p>8 this mirrors what we wrote at the top of</p> <p>9 the story, is that this is a young woman</p> <p>10 who felt that she was -- who felt</p> <p>11 unsupported by various institutions.</p> <p>12 So from, you know, this is a story</p> <p>13 about a young woman who reported a sexual</p> <p>14 assault to authorities and to her school</p> <p>15 and she felt as though she was failed to</p> <p>16 the point where she, you know, seemed to</p> <p>17 have fallen into a depression and</p> <p>18 committed suicide after leaving her</p> <p>19 school.</p> <p>20 Q. (By Mr. Cockrell) Did BuzzFeed--</p> <p>21 you, Katie Baker, or anybody --determine</p> <p>22 yourselves that there were institutional</p> <p>23 failures that failed Megan Rondini?</p>
Page 203	Page 204
<p>1 MS. STROM: Objection.</p> <p>2 A. I mean --</p> <p>3 MS. STROM: Sorry, you can</p> <p>4 answer.</p> <p>5 A. I can't speak for what Katie or</p> <p>6 anyone else thinks.</p> <p>7 My role and I find that my role is</p> <p>8 to present facts and to present, you know,</p> <p>9 fair information to a reader, and then,</p> <p>10 you know, really from there it's on</p> <p>11 readers to draw their opinion and what</p> <p>12 they think about a story.</p> <p>13 Our job is to find and report on</p> <p>14 stories that are in the public interest</p> <p>15 and then by reviewing those facts a reader</p> <p>16 draws their opinion.</p> <p>17 Q. (By Mr. Cockrell) Well, did you</p> <p>18 form one in your review of the facts</p> <p>19 whether there was a failure of</p> <p>20 institutional -- failure of the</p> <p>21 institutions in Tuscaloosa in some way?</p> <p>22 A. I'm neither a lawmaker or a police</p> <p>23 officer, so I tend to defer to other</p>	<p>1 people on whether those -- on those types</p> <p>2 of decisions and opinions.</p> <p>3 Q. Did you do that when you performed</p> <p>4 editing on the BuzzFeed article regarding</p> <p>5 Megan Rondini, defer to other people?</p> <p>6 A. The reader. I mean ultimately it</p> <p>7 is the reader and it is folks who are</p> <p>8 reading the story who my job is to convey</p> <p>9 fair and accurate information, and from</p> <p>10 there the reader to draw whatever they're</p> <p>11 takeaway is from a story.</p> <p>12 Q. Did it seem fair to you to tell</p> <p>13 Megan Rondini's story and not tell --</p> <p>14 produce all the evidence, all the video,</p> <p>15 all the other evidence that was out there</p> <p>16 so the public could decide?</p> <p>17 MS. STROM: Objection to the</p> <p>18 extent you're insinuating that the other</p> <p>19 side was not included in the article.</p> <p>20 But you can answer, Marisa.</p> <p>21 A. Yeah, I mean I would say we went</p> <p>22 -- we always do our best to take special</p> <p>23 care as in this case to include -- to</p>

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<p>1 include all sides, to include quotes from 2 say Gary Hood, to reach out for comment to 3 explain. 4 And really what my job is and what 5 my role is is to help tell a story that is 6 fair and accurate and true, and I do think 7 I did that there. 8 I can't -- I don't know what other 9 information you're speaking to, but I feel 10 confident that we told a fair and accurate 11 story and I trust -- 12 Q. (By Mr. Cockrell) Go ahead, I'm 13 sorry. I didn't mean you cut you off. 14 A. And speaking of institutions, 15 institutionally that's why we have a fact 16 checker, that's why we have two editors. 17 That's why we have a reporter 18 whose work we -- whose work we not only 19 trust but who we've seen do a really 20 dogged, fair job in action. 21 So that's why it's important to us 22 to have multiple people as stop gaps 23 working on these stories so that at the</p>	<p>1 end of the day we do feel like they're 2 fair and accurate. 3 Q. If you had direct evidence that 4 refuted a claim by the victim as here, 5 that she was unconscious or can't 6 remember, you know, is it on you to show 7 it all so that the public can decide one 8 way or the other? 9 MS. STROM: Objection. To 10 the extent this is insinuating that the 11 story is about if Megan Rondini was raped 12 or not, and object as to what direct 13 refute means, but if you can answer that, 14 Marisa, you can. 15 A. I don't know -- I really don't 16 know what you mean. 17 Q. (By Mr. Cockrell) Because you 18 haven't seen all the video from the 19 apartment complex security cameras, have 20 you? 21 MS. STROM: Objection. That 22 completely mischaracterizes her prior 23 testimony.</p>
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<p>1 Q. (By Mr. Cockrell) You can answer. 2 A. I don't understand what this 3 question has to do with the published 4 story or with my role and work on the 5 story. 6 Q. Well, you were one of the decision 7 makers of what's left out and what's comes 8 into the story, am I wrong? 9 A. I was an editor -- one of the 10 editors on this story. I don't understand 11 what videos that I don't -- I just don't 12 remember enough information to be able to 13 understand not only how to answer but even 14 the question that you're asking. 15 Q. Fair enough. All right. 16 MS. STROM: Is it time for a 17 break now, Bob? 18 MR. COCKRELL: Yeah. We 19 offer 51 and we'll take a break. 20 MS. STROM: Thank you. 21 VIDEOGRAPHER: Off the 22 record at 1:42. 23 (Recess was taken.)</p>	<p>1 VIDEOGRAPHER: Back on the 2 record at 1:55. 3 Q. (By Mr. Cockrell) All right. 4 Let's mark this one. I hate to mark it. 5 I may ask you about it first and just see, 6 you know. 7 It's another -- I don't know if 8 you can see this or not. Can you see 9 that? 10 A. No. 11 Q. Too bad. Okay. I was trying to 12 save us time. Okay. 13 I'm going to tell you, Marisa, I 14 apologize. I tell them I'm a low-tech 15 redneck, and we're not used to taking 16 depositions like this so we're -- 17 MS. STROM: I don't think 18 any of us are used to these Zoom 19 depositions because we're all figuring it 20 out. 21 MR. COCKRELL: I hate them. 22 I would rather be in New York eating 23 cheesecake up there, but any way, here we</p>

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<p>1 are.</p> <p>2 MS. STROM: Trust me, that</p> <p>3 is not what you would be doing right now.</p> <p>4 You'd be taking cover.</p> <p>5 Q. (By Mr. Cockrell) All right. I'm</p> <p>6 looking at -- I'm looking at another one</p> <p>7 of those Google Docs and it says from</p> <p>8 Katie Baker to Tina Susman, and then it</p> <p>9 goes down here and you make a comment Tina</p> <p>10 Susman --</p> <p>11 MS. STROM: Sorry, Bob,</p> <p>12 let's show it. I know you're trying to</p> <p>13 save us time --</p> <p>14 MR. COCKRELL: Yeah, it's</p> <p>15 not really that relevant and that's why I</p> <p>16 hate to do it, but what exhibit number are</p> <p>17 we at?</p> <p>18 COURT REPORTER: 52.</p> <p>19 MR. COCKRELL: All right.</p> <p>20 Scotch, it is 2346.</p> <p>21 (Whereupon, a document was marked</p> <p>22 as Plaintiff's Exhibit No. 52 and</p> <p>23 is attached to the original</p>	<p>1 transcript.)</p> <p>2 Q. Let him know when you want him to</p> <p>3 scroll down.</p> <p>4 A. You can scroll down, thank you.</p> <p>5 You can keep scrolling.</p> <p>6 Q. Scroll, a little more, Scotch.</p> <p>7 Let me know when you're through. It's a</p> <p>8 lot of reading for such a short little</p> <p>9 answer -- question, but you know.</p> <p>10 A. If there's more to scroll, then</p> <p>11 you can keep scrolling.</p> <p>12 Q. Keep scrolling.</p> <p>13 MR. RITCHEY: That should be</p> <p>14 the end of that. That should be the end</p> <p>15 of that document.</p> <p>16 A. I'm ready when you're ready.</p> <p>17 Q. (By Mr. Cockrell) Okay. Go back</p> <p>18 to back -- there's a first page, Scotch.</p> <p>19 I think you wrote on the Google</p> <p>20 document this is kind of stupid with</p> <p>21 something like this, maybe we can make</p> <p>22 this even more dramatic. And maybe Katie</p> <p>23 said that, and you said definitely</p>
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<p>1 something like this.</p> <p>2 What were y'all talking about to</p> <p>3 make it more dramatic?</p> <p>4 A. I have no idea.</p> <p>5 Q. Is there any -- I know this has</p> <p>6 been redacted above and beyond. Would</p> <p>7 that help you be able to answer that</p> <p>8 question if we had it, if it wasn't --</p> <p>9 MS. STROM: Objection.</p> <p>10 Objection.</p> <p>11 A. I just don't know what this is</p> <p>12 about and I also couldn't then -- so I</p> <p>13 can't predict if I had more words if I</p> <p>14 know what it was about. I just don't -- I</p> <p>15 just don't know looking at this what is it</p> <p>16 about.</p> <p>17 Q. (By Mr. Cockrell) We know if we</p> <p>18 can't see it, we don't know if it could</p> <p>19 help or not; is that right? Help you</p> <p>20 remember?</p> <p>21 MS. STROM: Objection.</p> <p>22 Objection.</p> <p>23 Q. (By Mr. Cockrell) Isn't that true?</p>	<p>1 A. All I can -- I just don't -- I</p> <p>2 just don't remember and I don't know</p> <p>3 enough to give you any other answer than I</p> <p>4 just don't know what this is about.</p> <p>5 Q. And I don't have enough on here to</p> <p>6 help jog your memory to be able to do that</p> <p>7 so we'll move on.</p> <p>8 MR. COCKRELL: We offer</p> <p>9 Exhibit 52.</p> <p>10 MS. STROM: Bob, that was 51</p> <p>11 and you're showing 52?</p> <p>12 MR. COCKRELL: That was 52.</p> <p>13 COURT REPORTER: That was</p> <p>14 52, 2346. 51 was 2527.</p> <p>15 MS. BOLGER: What was 50?</p> <p>16 COURT REPORTER: 50 was</p> <p>17 2620.</p> <p>18 MR. COCKRELL:</p> <p>19 Scotch, pull up 2475, and this will be 53;</p> <p>20 right?</p> <p>21 (Whereupon, a document was marked</p> <p>22 as Plaintiff's Exhibit No. 53 and</p> <p>23 is attached to the original</p>

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<p>1 transcript.)</p> <p>2 A. Can you please zoom in a couple of</p> <p>3 times? Thank you. I'm ready for you to</p> <p>4 keep scrolling. Thank you. You can keep</p> <p>5 scrolling. Keep scrolling. You can keep</p> <p>6 scrolling.</p> <p>7 MR. RITCHEY: I think it's</p> <p>8 frozen.</p> <p>9 MR. COCKRELL: Technology.</p> <p>10 I'm glad I'm at the end of my career and</p> <p>11 not the beginning.</p> <p>12 Is that the first page?</p> <p>13 MR. RITCHEY: I think this</p> <p>14 is last part of the second page.</p> <p>15 MR. COCKRELL: Pull up in</p> <p>16 first page and it's 2475 and this is 53.</p> <p>17 Q. All right. Can you see it?</p> <p>18 A. I can see what's on the screen</p> <p>19 now, yes.</p> <p>20 Q. Okay, good. This is Plaintiff's</p> <p>21 Exhibit 53.</p> <p>22 Is this more of those Google Docs?</p> <p>23 A. This would have been yes, related</p>	<p>1 to a Google Doc.</p> <p>2 Q. It says here about one, two, maybe</p> <p>3 three paragraphs down, Marisa Carroll,</p> <p>4 when politicians and committee leaders</p> <p>5 don't take rape reports seriously cases</p> <p>6 will crumble along the way, said Colby</p> <p>7 Bruno, senior legal counsel at Victims</p> <p>8 Rights Law Center.</p> <p>9 Did you interview him or did one</p> <p>10 of the reporters interview him?</p> <p>11 MS. STROM: Objection as to</p> <p>12 him. Are you talking about Colby Bruno?</p> <p>13 MR. COCKRELL: Colby Bruno.</p> <p>14 I don't know what his real name is.</p> <p>15 A. I could only guess. I would guess</p> <p>16 that Katie interviewed him, but I would</p> <p>17 rather just say that I did not and I can't</p> <p>18 remember.</p> <p>19 Q. It says whether it's the president</p> <p>20 of the United States, a police chief, or</p> <p>21 the head of a hospital these positions</p> <p>22 matter because they can establish policies</p> <p>23 and protocols that prevent and punish or</p>
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<p>1 they can ignore problems.</p> <p>2 Did you find evidence that the</p> <p>3 hospital ignored the problem in</p> <p>4 Tuscaloosa, DCH Medical Center?</p> <p>5 MS. STROM: Objection.</p> <p>6 A. So I didn't -- first of all, my</p> <p>7 understanding is that this wasn't a --</p> <p>8 this isn't a paragraph I would have</p> <p>9 written. That would have been in a Google</p> <p>10 document and I'm responding to it in the</p> <p>11 note below to it.</p> <p>12 Q. (By Mr. Cockrell) Okay. In fact,</p> <p>13 you said you don't feel like you need</p> <p>14 this; right?</p> <p>15 A. Yeah, it looks like I responded to</p> <p>16 this and said it seemed like we didn't</p> <p>17 need that.</p> <p>18 Q. Since you have other experts</p> <p>19 above. What other experts were you</p> <p>20 talking about?</p> <p>21 A. I can't remember.</p> <p>22 Q. It says other expert above. Would</p> <p>23 that have been something that would have</p>	<p>1 been in the Google document that said the</p> <p>2 name of that expert?</p> <p>3 MS. STROM: Objection.</p> <p>4 You can answer if you</p> <p>5 remember, Marisa.</p> <p>6 A. Yeah, it's just hard for me to</p> <p>7 know without looking at it in the context</p> <p>8 of the Google document.</p> <p>9 Q. (By Mr. Cockrell) Yeah, and it</p> <p>10 would be hard to know if it's redacted,</p> <p>11 too, wouldn't it, where you can go back</p> <p>12 and look and see if it's there; is that</p> <p>13 true?</p> <p>14 A. I just don't know.</p> <p>15 Q. Okay. But we do know if you can't</p> <p>16 see it, the document, you for sure can't</p> <p>17 -- absolutely can't tell who the expert</p> <p>18 was; is that correct?</p> <p>19 MS. STROM: Objection.</p> <p>20 A. I just don't know -- looking at</p> <p>21 this, I just don't know what -- I just</p> <p>22 don't have enough context to know what's</p> <p>23 going on in this document.</p>

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<p>1 Q. (By Mr. Cockrell) Okay. And I'm 2 looking down further on the document, and 3 you wrote on this Google Docs, or maybe 4 Katie did, it says, Katie Baker, and it's 5 because powerful men are still able to pay 6 their way out of scrutiny, whether they're 7 Donald Trump or a good-ol boy from 8 Tuscaloosa, not this because it is legally 9 risky and a bit much, but something like 10 this I can't figure out what to do here, 11 help. 12 That's what Katie said; is that 13 right, Katie Baker? 14 A. That's what it looks like, looking 15 at this document. 16 Q. And you said it's also one of 17 those things where their power is based in 18 money, but there wasn't a direct payoff. 19 Do you remember saying that? 20 A. I don't remember saying that, but 21 I can't see it here. 22 Q. That would be your comment, 23 though?</p>	<p>1 A. Yes, it looks like a comment I 2 made in a Google Doc. 3 Q. Did you find any evidence or 4 anybody at BuzzFeed any evidence that the 5 Bunns paid off the investigators, the 6 sheriff, the DA, or anybody to get 7 T. J. Bunn out of -- from being charged 8 with sexual assault or rape in the Rondini 9 case? 10 A. I know that the article doesn't -- 11 the published article doesn't say that and 12 it looks like I can't remember back to the 13 time, but it looks like this comment said 14 that that didn't happen either, so that's 15 all can I speak to. 16 Q. Okay. 17 A. I know the published article and 18 it seems like this comment that's what 19 we're saying. 20 Q. And in the bottom down here, in 21 the middle of the next page, which is 22 2476, scroll up to that, Scotch. 23 Katie Baker said something like</p>
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<p>1 this to make it clear she thought she was 2 drugged. What was she talking about 3 there? 4 MS. STROM: Objection. 5 A. I don't know what Katie was 6 talking about. You would have to ask 7 Katie what she was talking about. 8 Q. (By Mr. Cockrell) But you don't 9 know? 10 A. I don't know. I only know looking 11 at this page and you would have to ask 12 Katie. 13 Q. Okay. And you wrote did she tell 14 the police that she thought she was 15 drugged. Can we say, but at some point 16 she blacked out according to the police 17 report. She thought she had been drugged. 18 A. Yes, it looks like that's a 19 comment that I wrote on the Google Doc. 20 Q. What evidence did you have that 21 you thought she had been drugged? 22 MS. STROM: Objection. 23 A. So I don't deal in evidence. I'm</p>	<p>1 not a lawyer. I'm not a police officer. 2 It seems in this comment, my best 3 understanding is that I'm asking the same 4 question you are, basically, right, is 5 where is an idea being attributed to. 6 Q. And we're interested in the truth; 7 right? In telling the truth. So you 8 asked did she tell the police that she 9 thought she was drugged. 10 Did you ever get an answer to 11 that? 12 MS. STROM: Objection to the 13 extent you're talking about if they're 14 telling the truth. 15 The article never said she 16 was drugged. You can answer, Marisa, 17 beyond though. 18 Q. (By Mr. Cockrell) It said the 19 simple -- 20 A. Yes, I can't -- I just can't 21 remember. We could refer to the actual 22 article about what ended up running in the 23 published article, which is what this is</p>

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<p>1 all about, but no, I don't -- I don't</p> <p>2 remember.</p> <p>3 Q. Okay. And then you asked down at</p> <p>4 the bottom something that is true and fair</p> <p>5 is that both Trump and Bunn have been</p> <p>6 accused by multiple women, yet have been</p> <p>7 untarnished by the accusations.</p> <p>8 Is that just a comment you made?</p> <p>9 A. It looks like that's a comment I</p> <p>10 made in the Google Doc that is then not</p> <p>11 reflected in the final story.</p> <p>12 MR. COCKRELL: Scotch, let's</p> <p>13 go to BuzzFeed 2471. And this is what?</p> <p>14 COURT REPORTER: 54.</p> <p>15 (Whereupon, a document was marked</p> <p>16 as Plaintiff's Exhibit No. 54 and</p> <p>17 is attached to the original</p> <p>18 transcript.)</p> <p>19 Q. Can you see it?</p> <p>20 A. I can see this, yes. I'm trying</p> <p>21 to read as you're scrolling.</p> <p>22 Q. Just take your time and read it.</p> <p>23 A. I'm ready for you to keep</p>	<p>1 scrolling.</p> <p>2 MS. BOLGER: Bob, is this</p> <p>3 54?</p> <p>4 MR. COCKRELL: It is.</p> <p>5 MS. BOLGER: My role here is</p> <p>6 to count.</p> <p>7 MR. COCKRELL: Thank you, I</p> <p>8 need all the help can I get.</p> <p>9 A. I'm ready for you to keep</p> <p>10 scrolling please. Thank you. I'm ready.</p> <p>11 Q. Go to the first page, which is</p> <p>12 2471.</p> <p>13 You say Marisa Carroll, we</p> <p>14 shouldn't use Trump's name since we don't</p> <p>15 name Bunn here. It is a parallel, but I</p> <p>16 think this is fine and not weird to point</p> <p>17 to Trump president.</p> <p>18 And then Katie Baker says looks</p> <p>19 like the biggest one is they're a high</p> <p>20 false report rate, said Amy</p> <p>21 Gundlach-Foster, a former executive</p> <p>22 director of Tuscaloosa Turning Point</p> <p>23 Center.</p>
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<p>1 So is Katie saying there, what</p> <p>2 appears to me, that Amy Gundlach-Foster,</p> <p>3 the former executive director of</p> <p>4 Tuscaloosa Turning Point Center said that</p> <p>5 that's not true, but myths are hard to get</p> <p>6 out of people's head.</p> <p>7 MS. STROM: Objection to the</p> <p>8 extent you're talking about Marisa Carroll</p> <p>9 said and Katie said, those appear to be</p> <p>10 about different comments in the Google</p> <p>11 Doc, they don't go together, but your</p> <p>12 question seems to be related just to that</p> <p>13 second point.</p> <p>14 Q. (By Mr. Cockrell) Do you know if</p> <p>15 Katie talked to Amy Gundlach-Foster, the</p> <p>16 former executive director of Tuscaloosa</p> <p>17 Turning Point Center?</p> <p>18 A. It seems that way, but you would</p> <p>19 have to ask Katie --</p> <p>20 Q. Okay. You don't remember -- I'm</p> <p>21 sorry. Go ahead.</p> <p>22 A. Sorry. I know she talked to</p> <p>23 experts while reporting this story, but I</p>	<p>1 can't -- I don't want to misspeak, so I</p> <p>2 would say I don't know and better to ask</p> <p>3 Katie or someone else.</p> <p>4 Q. Okay. So you don't know of any</p> <p>5 experts that she talked to in preparing</p> <p>6 this story, the Rondini story, prior to</p> <p>7 publication?</p> <p>8 A. Well, when I said that I know she</p> <p>9 did speak to experts, but, you know, four</p> <p>10 years later I don't remember their names</p> <p>11 and she would have -- someone else would</p> <p>12 have a better memory of that than I would.</p> <p>13 Q. You wouldn't have spoken with the</p> <p>14 experts yourself, would you have?</p> <p>15 A. So that would actually be very</p> <p>16 unusual -- it would be very unusual for an</p> <p>17 editor to interview sources, so this is</p> <p>18 the reason that these stories are --</p> <p>19 require many countless hours from many</p> <p>20 people.</p> <p>21 So a reporter is out doing the</p> <p>22 interviews and an editor is work -- in</p> <p>23 this case, multiple editors, are working</p>

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<p>1 with the reporter and then a fact checker</p> <p>2 goes back and reviews the information and</p> <p>3 the interviews, but, no, it would be very</p> <p>4 unusual for me to interview an expert on a</p> <p>5 story.</p> <p>6 Q. Would it be unusual for an editor</p> <p>7 to review expert reports on a story?</p> <p>8 MS. STROM: Objection, to</p> <p>9 the extent expert reports is unclear to</p> <p>10 me, but go ahead, Marisa.</p> <p>11 A. Yeah, could you explain more about</p> <p>12 what you mean by expert reports?</p> <p>13 Q. (By Mr. Cockrell) Like expert</p> <p>14 reports that might be quoted in the</p> <p>15 potential story that you're working on</p> <p>16 that you're editing.</p> <p>17 Would it be unusual -- you get the</p> <p>18 draft of it and it mentions an expert and</p> <p>19 quotes an expert, would you ever see as an</p> <p>20 editor a written expert report that was</p> <p>21 used to write the article?</p> <p>22 A. I don't understand like an expert</p> <p>23 report as maybe it's a law term of art but</p>	<p>1 that has -- I just don't understand.</p> <p>2 Q. Well, we call them expert</p> <p>3 witnesses, but you would probably call it</p> <p>4 as a reporter expert on the subject, you</p> <p>5 know, like sexual assault or rape.</p> <p>6 If Katie say, for example, is</p> <p>7 going to write a story on sexual assault</p> <p>8 and rape and she gets some experts to give</p> <p>9 quotes and they provided her with a</p> <p>10 report, is that something you would need</p> <p>11 to look at as an editor?</p> <p>12 MS. STROM: Objection.</p> <p>13 Assumes that there's expert reports, but</p> <p>14 go ahead, Marisa.</p> <p>15 A. Like an expert report is not</p> <p>16 anything that I have ever heard of, so I</p> <p>17 just don't -- so I don't know. And if the</p> <p>18 reporter interviews experts, they</p> <p>19 interview the experts.</p> <p>20 Q. (By Mr. Cockrell) So you haven't</p> <p>21 seen any expert reports in this case?</p> <p>22 That would have probably been a better</p> <p>23 question to ask to start with; is that</p>
Page 227	Page 228
<p>1 right?</p> <p>2 A. I don't know if I've ever seen an</p> <p>3 expert report in my whole career. That's</p> <p>4 not an idea that's familiar to me.</p> <p>5 Q. I'm asking in this case, the</p> <p>6 Rondini case, for the Rondini story have</p> <p>7 you seen any expert reports prior to</p> <p>8 publication?</p> <p>9 MS. STROM: Objection. She</p> <p>10 said many times she doesn't even know what</p> <p>11 you're referring to by an expert report,</p> <p>12 so hard to answer that question.</p> <p>13 A. I don't understand what an expert</p> <p>14 report is so I don't -- I don't remember</p> <p>15 because I just don't understand what that</p> <p>16 would be.</p> <p>17 Q. (By Mr. Cockrell) It would be</p> <p>18 where an expert renders their opinion to</p> <p>19 some subject that's relevant to the story</p> <p>20 in writing or by email or, you know, could</p> <p>21 be electronic or written form.</p> <p>22 Did you see anything like that in</p> <p>23 this case?</p>	<p>1 A. Again, I think there's like just a</p> <p>2 misunderstanding of what that is in</p> <p>3 journalism.</p> <p>4 I just don't know what that -- I'm</p> <p>5 not familiar with the idea with that at</p> <p>6 all, so no, I didn't review something</p> <p>7 called an expert report in this case to</p> <p>8 the best of my recollection, but I don't</p> <p>9 -- I just don't totally understand the</p> <p>10 question and what that could.</p> <p>11 Q. Okay, that's fine.</p> <p>12 MR. COCKRELL: We offer 54.</p> <p>13 MS. STROM: That was 54;</p> <p>14 right?</p> <p>15 MR. COCKRELL: That's</p> <p>16 correct.</p> <p>17 Q. I'm looking at BuzzFeed 2472, that</p> <p>18 will be 55, Plaintiff's Exhibit 55.</p> <p>19 (Whereupon, a document was marked</p> <p>20 as Plaintiff's Exhibit No. 55 and</p> <p>21 is attached to the original</p> <p>22 transcript.)</p> <p>23 A. I'm ready for you to scroll down</p>

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<p style="text-align: right;">Page 229</p> <p>1 please. I've read this now.</p> <p>2 Q. Okay. If go to BuzzFeed 2472, the</p> <p>3 first page, go down a little further, the</p> <p>4 last sentence there says Marisa Carroll</p> <p>5 agree, I think that the reason we added</p> <p>6 these expert quote was because a nut</p> <p>7 wasn't strong enough, but now it's really</p> <p>8 strong.</p> <p>9 Katie is clear but also can be</p> <p>10 authoritative here since, one, she has so</p> <p>11 much reporting in the story, and, two,</p> <p>12 this is area of expertise.</p> <p>13 Is stories on sexual assault and</p> <p>14 rape Katie Baker's area of expertise?</p> <p>15 A. Yeah, it's her -- at the time was</p> <p>16 her beat in journalism, one of her beats.</p> <p>17 Q. What's a beat?</p> <p>18 A. A beat is a particular topic area</p> <p>19 that a reporter is particularly skilled on</p> <p>20 or a topic area that a reporter does a</p> <p>21 number of stories building -- accumulating</p> <p>22 experience on the topic and doing stories</p> <p>23 on that topic.</p>	<p style="text-align: right;">Page 230</p> <p>1 Q. Do you know what expert quotes</p> <p>2 they're talking about here, you're talking</p> <p>3 about in your Google Doc response here?</p> <p>4 A. I don't remember.</p> <p>5 Q. When you say the nut wasn't strong</p> <p>6 enough, what does that mean?</p> <p>7 A. I don't remember -- I don't know</p> <p>8 what that means from reading this.</p> <p>9 Q. You say but now it's really</p> <p>10 strong. What do you mean by that?</p> <p>11 A. Same, I just don't -- I just don't</p> <p>12 understand or remember.</p> <p>13 Q. And when you say that Katie is</p> <p>14 clear but also can be authoritative here</p> <p>15 since, one, she has so much reporting in</p> <p>16 the story. What does so much reporting in</p> <p>17 the story mean?</p> <p>18 A. I also -- I mean, I even have</p> <p>19 typos in this one. It's hard for me to</p> <p>20 understand looking at it what it is. I</p> <p>21 know that this is -- yeah, I just don't</p> <p>22 know.</p> <p>23 Q. Okay. And you consider this as</p>
<p style="text-align: right;">Page 231</p> <p>1 her area of expertise?</p> <p>2 A. Katie -- I don't know what her job</p> <p>3 title or what her beat is now, but at the</p> <p>4 time, yes, Katie was a preeminent reporter</p> <p>5 with lots of experience covering all sorts</p> <p>6 of gender issues, gender violence, sexual</p> <p>7 assault.</p> <p>8 Q. Can you think of any articles that</p> <p>9 were published in particular where she is</p> <p>10 authoritative with regard to the area of</p> <p>11 sexual assault and rape and gender</p> <p>12 violence?</p> <p>13 A. It's hard for me to name a</p> <p>14 specific story because I know she's worked</p> <p>15 and I've worked with her on so many, but I</p> <p>16 haven't been her -- you know I haven't</p> <p>17 been her colleague in a couple of years</p> <p>18 now at least.</p> <p>19 Q. These stories prior to publication</p> <p>20 of the Rondini story that she wrote on</p> <p>21 this subject were they all for BuzzFeed?</p> <p>22 A. Could you repeat the question?</p> <p>23 Sorry.</p>	<p style="text-align: right;">Page 232</p> <p>1 Q. Yeah, these stories that she</p> <p>2 reported on sexual assault and rape and</p> <p>3 gender violence prior to publication of</p> <p>4 the Rondini story, were they all for</p> <p>5 BuzzFeed or do you recall if she published</p> <p>6 anywhere else -- she was published</p> <p>7 anywhere else?</p> <p>8 A. You would have to ask Katie. I</p> <p>9 recall that she had worked at and</p> <p>10 published, you know, well-respected, even</p> <p>11 award-winning stories at other outlets</p> <p>12 before and different than BuzzFeed.</p> <p>13 Q. Can you tell me what other</p> <p>14 outlets?</p> <p>15 A. She would do better at answering</p> <p>16 this question. I know that she worked for</p> <p>17 one at Newsweek Magazine and I also know</p> <p>18 in the time that I worked with her she</p> <p>19 published -- I think she's better suited,</p> <p>20 but I know that she worked at Newsweek</p> <p>21 Magazine and Jezebel.</p> <p>22 Q. Jezebel. What is Jezebel?</p> <p>23 A. It's a blog, a news blog, that</p>

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<p>1 does that does reporting but I actually</p> <p>2 don't -- I'm not the right person to</p> <p>3 describe it as I never worked there.</p> <p>4 Q. Okay. We offer Plaintiff's</p> <p>5 Exhibit 55.</p> <p>6 What is a straight news story?</p> <p>7 What's the definition of a straight news</p> <p>8 story?</p> <p>9 A. I don't know the answer to that</p> <p>10 question. Are you quoting something</p> <p>11 specifically?</p> <p>12 Q. Yeah, let me -- I'll go ahead and</p> <p>13 put it in.</p> <p>14 (Whereupon, a document was marked</p> <p>15 as Plaintiff's Exhibit No. 56 and</p> <p>16 is attached to the original</p> <p>17 transcript.)</p> <p>18 Q. Plaintiff's Exhibit 56. If we</p> <p>19 were together I could just show you and we</p> <p>20 wouldn't have to go through all of this,</p> <p>21 but that's the way it works now.</p> <p>22 BuzzFeed 2663. You can pull that</p> <p>23 up for us, Scotch?</p>	<p>1 A. I'm ready for you to scroll if</p> <p>2 there is more. I'm ready when you are.</p> <p>3 Q. Yeah, let me know -- I want to</p> <p>4 give you plenty of time to read, but just</p> <p>5 let me know when you're ready.</p> <p>6 A. Would you actually mind scrolling</p> <p>7 up a little more just so I can see the</p> <p>8 very top of it? I sort of skimmed over</p> <p>9 it. That part. Great. Okay, Thank you.</p> <p>10 Q. This is another one of the Google</p> <p>11 Docs; is that correct?</p> <p>12 A. Yeah.</p> <p>13 Q. I'm learning something today.</p> <p>14 Okay.</p> <p>15 So after having read that, can you</p> <p>16 tell me what you're referring to as</p> <p>17 straight news story? What is that?</p> <p>18 A. I honestly don't know because I</p> <p>19 don't know -- without knowing the quote</p> <p>20 and without knowing everything, I just</p> <p>21 don't know what I would have meant by</p> <p>22 that.</p> <p>23 MS. STROM: I just want to</p>
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<p>1 represent again, Bob, that we've produced</p> <p>2 all of the drafts and all you have to do</p> <p>3 is put together the drafts with the Google</p> <p>4 Docs so they can correspond.</p> <p>5 MR. COCKRELL: Yeah, I</p> <p>6 can't -- you know without seeing the quote</p> <p>7 I can't help her, you know, where she can</p> <p>8 answer the question which is probably in</p> <p>9 the redacted part.</p> <p>10 MS. STROM: No, no. These</p> <p>11 aren't part of redacted. These go to the</p> <p>12 Google document. We've given you all of</p> <p>13 the drafts.</p> <p>14 The Google documents are the</p> <p>15 drafts, we've produced all the drafts for</p> <p>16 you, so these correspond to the comments</p> <p>17 in the draft. All you have to do is put</p> <p>18 them together.</p> <p>19 MR. RITCHEY: Just off the</p> <p>20 record.</p> <p>21 (Off-the-record discussion.)</p> <p>22 MR. COCKRELL: Either way, I</p> <p>23 can't see the quote.</p>	<p>1 MS. STROM: If you put it</p> <p>2 with the Google draft you could, because</p> <p>3 you could see it's responding to draft</p> <p>4 216, so you go to draft 216 and you can</p> <p>5 find where it says that in the draft.</p> <p>6 MR. COCKRELL: You got that,</p> <p>7 Scotch?</p> <p>8 Q. Okay. Was this story --</p> <p>9 MS. STROM: That's the way</p> <p>10 the technology works for producing Google</p> <p>11 drafts.</p> <p>12 Q. (By Mr. Cockrell) Was this story a</p> <p>13 straight news story, the Rondini story?</p> <p>14 A. I don't know, without knowing what</p> <p>15 I meant or what one means by straight news</p> <p>16 story. I just don't know.</p> <p>17 Q. What kind of story was it?</p> <p>18 A. I would say this was an</p> <p>19 investigative news story. It was an</p> <p>20 investigative story.</p> <p>21 Q. Okay. All right. We offer</p> <p>22 Exhibit 56.</p> <p>23 I'm going to mark this Plaintiff's</p>

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<p>1 Exhibit 57. 2 (Whereupon, a document was marked 3 as Plaintiff's Exhibit No. 57 and 4 is attached to the original 5 transcript.) 6 Q. Go ahead, and pull that up, 7 Scotch, it's 2752. 8 Let me know if you're through 9 reading it. 10 A. I've read it. 11 Q. Okay. I'm reading under Katie 12 Baker, it says special inquiry, worth 13 getting a quote from an expert about how 14 this is weird. 15 And you wrote, weird how? Weird 16 compared to other cities, states, 17 percentages of special inquiries, question 18 mark. That's all I got out of that. 19 Did Katie respond to you on that? 20 A. I don't remember. 21 Q. Do you know if there was an expert 22 hired to determine whether special 23 inquiries were weird when compared with</p>	<p>1 what other cities and states do? 2 A. So I do want you to know that we 3 don't hire experts in journalism. It's 4 very taboo to pay anyone to be an expert 5 to give an interview because that's how 6 we're -- when we talk to experts we're 7 speaking to them as sources being, for 8 instance, interviewed in a story so we 9 would not ever pay someone. 10 Q. Thank you for that. 11 A. But I can't -- I know Katie spoke 12 to many, many experts and spoke to the 13 people, you know, and asked the most key 14 experts in many ways who are the people, 15 you know, within the department who deal 16 with special inquiries to ask them 17 questions to be reflected in the story 18 itself, but I can't remember specifically 19 who was all asked about it. 20 Q. Okay. That's probably a question 21 better for Katie. 22 Would you agree with me that rank 23 and file in police investigators like Adam</p>
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<p>1 Jones and Josh Hastings don't set policies 2 like special inquiries, they just follow 3 them? Would you agree with that? 4 MS. STROM: Objection. 5 Objection. She's not a police officer or 6 sheriff, but answer to the extent you can. 7 A. Well, I was just going to say you 8 asked a similar question before and my 9 answer is the same, which is that I'm not 10 a police officer. 11 I've never been to police 12 training. I can't -- I just don't know 13 the answer to that question. 14 Q. (By Mr. Cockrell) Okay. Do you 15 know if Katie Baker has any training in 16 law enforcement or anything like that? 17 A. I don't know. You'd have -- I 18 couldn't answer that question. 19 Q. Do you know -- 20 A. Because I don't -- I don't know 21 the answer. 22 Q. -- if anybody on the team that 23 evaluated the Rondini story or edited or</p>	<p>1 had anything to do with it, had any law 2 enforcement or training or experience? 3 A. I don't know if who or anyone on 4 -- who worked for BuzzFeed had law 5 enforcement experience. 6 When you open it up to anyone 7 involved at all, for instance, people who 8 were interviewed, I know Katie did 9 interview people who had law enforcement 10 training. 11 Q. Right. I'm talking about in the 12 hierarchy of BuzzFeed that had anything to 13 do with the Rondini story, not outside of 14 it. 15 A. I don't know the answer to that 16 question. 17 Q. Okay. That's fair. 18 Offer Plaintiff's Exhibit 57. 19 Why was it necessary in the story 20 to say that Megan was a vegetarian? 21 MS. STROM: Objection to the 22 extent it's necessary, but go ahead, 23 Marisa.</p>

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<p style="text-align: right;">Page 241</p> <p>1 A. Yeah, I don't -- I don't -- I</p> <p>2 guess, I don't understand the idea of</p> <p>3 necessary.</p> <p>4 Q. (By Mr. Cockrell) Why was it</p> <p>5 relevant? Why was it relevant to the</p> <p>6 story or helpful to the story that she was</p> <p>7 a vegetarian?</p> <p>8 A. I mean we include details about</p> <p>9 the subject of stories.</p> <p>10 Q. Did it help tell the story in some</p> <p>11 way?</p> <p>12 A. This is a story about Megan</p> <p>13 Rondini and, you know, when you're telling</p> <p>14 a story about someone, especially someone</p> <p>15 who hasn't lived to tell her own story,</p> <p>16 that's why we include -- we always include</p> <p>17 details about the person who a story is</p> <p>18 primarily about.</p> <p>19 Q. I think said Marisa Carroll, I eat</p> <p>20 meat. I guess you eat meat, I guess</p> <p>21 that's your words, and you wrote that if</p> <p>22 that's so think we can make a bigger point</p> <p>23 of her being --</p>	<p style="text-align: right;">Page 242</p> <p>1 MS. STROM: Can you show the</p> <p>2 document you're reading from?</p> <p>3 Q. (By Mr. Cockrell) Yeah, I'm going</p> <p>4 to show it without introducing it. Well,</p> <p>5 we'll introduce it.</p> <p>6 (Whereupon, a document was marked</p> <p>7 as Plaintiff's Exhibit No. 58 and</p> <p>8 is attached to the original</p> <p>9 transcript.)</p> <p>10 Q. Plaintiff's Exhibit 58.</p> <p>11 COURT REPORTER: What's the</p> <p>12 number?</p> <p>13 MR. COCKRELL: Excuse me,</p> <p>14 It's 2478.</p> <p>15 A. If you scroll down is there more</p> <p>16 or is this the --</p> <p>17 Q. That's the only sheet I'm looking</p> <p>18 at, one page there. Are you through?</p> <p>19 A. I'm through.</p> <p>20 Q. And you said is that so, think we</p> <p>21 can make a bigger point of her being a</p> <p>22 vegetarian when she's in the animal head</p> <p>23 room. What was that about?</p>
<p style="text-align: right;">Page 243</p> <p>1 Why was that important I guess is</p> <p>2 a better way of saying it?</p> <p>3 A. I guess it's hard for me to tell</p> <p>4 from looking at this comment, if it was</p> <p>5 important or what bigger would mean, any</p> <p>6 of it, without knowing the rest of the --</p> <p>7 the rest of it.</p> <p>8 It seems like there's -- hmm.</p> <p>9 Yeah, I just don't know. And I don't know</p> <p>10 how Katie responded to it.</p> <p>11 Q. Okay, neither do I.</p> <p>12 All right. Offer 58.</p> <p>13 In one of these documents when we</p> <p>14 talk about special inquiry, Katie says</p> <p>15 I've never heard the phrase special</p> <p>16 inquiry before.</p> <p>17 I think it's specific to</p> <p>18 Tuscaloosa. I know we're not into</p> <p>19 experts, that seems notable. I'm not</p> <p>20 qualified to say to myself I don't know.</p> <p>21 I don't think.</p> <p>22 MS. STROM: Could you show</p> <p>23 the document?</p>	<p style="text-align: right;">Page 244</p> <p>1 MR. COCKRELL: Yeah, pull</p> <p>2 that one up. I'm not going to introduce</p> <p>3 it, but 2830.</p> <p>4 A. I read this part of it.</p> <p>5 Q. You did? Okay. All right, I'm</p> <p>6 looking at the bottom down there says</p> <p>7 Marisa Carroll, I eat meat. Let me make</p> <p>8 sure I've got the right place.</p> <p>9 We can make a bigger -- it says I</p> <p>10 think we can make a bigger point of her</p> <p>11 being a vegetarian when she's in animal</p> <p>12 head room.</p> <p>13 A. I'm sorry, I didn't read that part</p> <p>14 of it. I was on the other part of the</p> <p>15 page.</p> <p>16 Q. Yeah, you can read it.</p> <p>17 A. Okay. I read it.</p> <p>18 Q. Okay. Why would y'all want to put</p> <p>19 the vegetarian part when she's in the</p> <p>20 animal head room? What would that add to</p> <p>21 the story?</p> <p>22 MS. STROM: Objection to the</p> <p>23 extent that's not in this story as</p>

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<p>1 published. It mischaracterizes the story.  2 Q. (By Mr. Cockrell) You can answer.  3 A. Yeah, all I can -- I can't speak  4 to what I thought at the time. All I know  5 it says it comes out of nowhere my  6 surprise that she was a vegetarian, so it  7 seems to me it's about introducing  8 information to the reader, but I really  9 can't remember more than that.  10 Q. Okay. And here she says -- Katie  11 Baker says, yeah, I had that at first, but  12 then it seemed too flowery. Also, she  13 Snapchatted a friend a joke about the  14 animal heads, so I didn't want to play it  15 up too much given that she didn't run out  16 of the room crying or anything.  17 Did you see those Snapchats to her  18 friends of the pictures of the animals?  19 A. I can't remember -- to my earlier  20 point, I can't remember if I saw  21 Snapchats.  22 MR. COCKRELL: What number  23 is that?</p>	<p>1 COURT REPORTER: At first  2 you said you weren't going to mark it.  3 MR. COCKRELL: Yeah, I  4 won't. You know what, let's mark it.  5 COURT REPORTER: It will be  6 59. To everyone on Zoom, that's 59.  7 (Whereupon, a document was marked  8 as Plaintiff's Exhibit No. 59 and  9 is attached to the original  10 transcript.)  11 Q. Let's mark the other one as  12 Plaintiff's Exhibit 60.  13 (Whereupon, a document was marked  14 as Plaintiff's Exhibit No. 60 and  15 is attached to the original  16 transcript.)  17 Q. And that is, Scotch, 2831.  18 Let me know when you're ready.  19 A. Okay, I'm ready to keep scrolling.  20 Q. At the bottom of BuzzFeed 2831,  21 that first page, this exhibit, 60 --  22 MS. STROM: Hold on. She  23 wanted just scroll and read it.</p>
Page 247	Page 248
<p>1 MR. COCKRELL: Okay, I'm  2 sorry. I thought she had read it.  3 MS. STROM: Yeah, the top  4 part.  5 A. Okay, I've read it.  6 Q. (By Mr. Cockrell) You ready?  7 A. I'm ready.  8 Q. Okay. You said down here at the  9 bottom of the page Megan, based on the  10 police documents and what she told police  11 will we be able to add any more language  12 to the graph about how panicked she was to  13 help justify her erratic and bizarre  14 behavior.  15 What were you trying to do there?  16 A. I'm asking Katie to look at police  17 documents and interviews to explain or  18 provide detail in the story.  19 I must have been -- my best read  20 is that I was confused by a paragraph in  21 the story.  22 Q. Should a reporter go out of her  23 way to justify erratic and bizarre</p>	<p>1 behavior? Is that her job to justify it?  2 A. I mean if you see there in the  3 next question I'm asking information. It  4 is a reporter's job to provide information  5 and detail that help a reader understand  6 what it is they're reading.  7 Q. Even if it means trying to  8 justify? I mean, should a reporter just  9 report without trying to justify?  10 MS. STROM: Objection. She  11 just explained what justified meant to  12 her.  13 But you can answer again,  14 Marisa.  15 A. Yeah, I would say if we just -- by  16 justify I mean the word explain, and, yes,  17 I do think it's a reporter's job to  18 explain.  19 Q. (By Mr. Cockrell) Did you think --  20 did you think Megan's conduct at that time  21 was erratic and bizarre behavior?  22 A. I can't remember how I -- what I  23 thought at the time.</p>

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<p>1 Q. You characterize her conduct as</p> <p>2 erratic and bizarre behavior and you don't</p> <p>3 remember why now?</p> <p>4 A. No, I don't -- and I don't know</p> <p>5 what paragraph this is referring to and,</p> <p>6 yeah, I just don't remember.</p> <p>7 Q. Okay, that's fair enough.</p> <p>8 MR. COCKRELL: Offer 60.</p> <p>9 Off the record.</p> <p>10 (Off the record.)</p> <p>11 Q. I'm taking a little minute trying</p> <p>12 to shorten this, trying to see if I can</p> <p>13 get by without doing this.</p> <p>14 MS. STROM: You know that's</p> <p>15 music to our ears.</p> <p>16 MR. COCKRELL: I know. I'm</p> <p>17 trying to shorten it.</p> <p>18 Q. You may have answered this</p> <p>19 question already, I can't remember, we've</p> <p>20 been going a while.</p> <p>21 As I get older my memory is not as</p> <p>22 good as it used to be, but I'm asking</p> <p>23 again, I apologize, but did you review the</p>	<p>1 hundreds of pages of text messages that</p> <p>2 Katie had on her cell phone?</p> <p>3 MS. STROM: Objection. I</p> <p>4 believe we did talk about this, but you</p> <p>5 can answer again, Marisa.</p> <p>6 A. Sure, I don't -- I don't remember</p> <p>7 specifically what I reviewed. I know that</p> <p>8 on our team at BuzzFeed there were many</p> <p>9 people.</p> <p>10 There was Katie, there was Tina,</p> <p>11 there was Sharmila and that's not -- more</p> <p>12 people beyond that even, so I didn't</p> <p>13 review every single document so I</p> <p>14 personally can't remember if I reviewed</p> <p>15 all those text messages.</p> <p>16 Q. (By Mr. Cockrell) Okay. We're</p> <p>17 going to be able to get rid of that one, too.</p> <p>18 Why is it that the BuzzFeed</p> <p>19 article describes Alabama rape law as</p> <p>20 archaic?</p> <p>21 A. I remember that's what's described</p> <p>22 in the story, but I don't remember, for</p> <p>23 instance, without seeing a conversation</p>
Page 251	Page 252
<p>1 about it I don't remember.</p> <p>2 Q. Well, do you think Alabama law is</p> <p>3 archaic on the rape law?</p> <p>4 MS. STROM: Objection.</p> <p>5 But you can answer to the</p> <p>6 extent you know, Marisa.</p> <p>7 A. I haven't followed Alabama rape</p> <p>8 law in the years since so I can't -- I</p> <p>9 can't speak to that.</p> <p>10 All I know that the article uses</p> <p>11 that term to describe the law.</p> <p>12 Q. (By Mr. Cockrell) And I'm not</p> <p>13 asking in the present tense, but at the</p> <p>14 time that the article -- immediately prior</p> <p>15 to being published when you were doing</p> <p>16 your editing work, why was Alabama rape</p> <p>17 law described as archaic?</p> <p>18 MS. STROM: Objection, asked</p> <p>19 and answered.</p> <p>20 A. Yeah, it's hard for me to remember</p> <p>21 specifically what -- to point specifically</p> <p>22 to those conversations that would be able</p> <p>23 to give you a comprehensive and complete</p>	<p>1 answer.</p> <p>2 Q. (By Mr. Cockrell) You can't answer</p> <p>3 that question; is that what you're telling</p> <p>4 me?</p> <p>5 MS. STROM: Objection, asked</p> <p>6 and answered.</p> <p>7 Q. (By Mr. Cockrell) Just a simple</p> <p>8 answer.</p> <p>9 A. Well, just to the question of why</p> <p>10 did the BuzzFeed article say it without</p> <p>11 being able to point to specific</p> <p>12 conversations, I don't want to guess.</p> <p>13 Q. Let's go ahead and mark this.</p> <p>14 What number is this one?</p> <p>15 COURT REPORTER: 61.</p> <p>16 (Whereupon, a document was marked</p> <p>17 as Plaintiff's Exhibit No. 61 and</p> <p>18 is attached to the original</p> <p>19 transcript.)</p> <p>20 Q. (By Mr. Cockrell) This one is</p> <p>21 2877.</p> <p>22 A. I've read this.</p> <p>23 Q. Okay. And if you go down, it says</p>

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<p>1 Marisa Carroll, like did she say she was 2 shaky and panicked and that's why she 3 fired the gun. 4 Katie Baker says up under, she 5 said she was really afraid because she 6 felt like she was locked in the room, but 7 I wanted to refrain from focusing on 8 whether she was really locked because he 9 denied locking her, and there's no proof. 10 Do you agree that there's no proof 11 that Megan Rondini was locked in 12 T. J. Bunn's bedroom? 13 MS. STROM: Objection to the 14 extent you're insinuating that the article 15 says she was locked in the bedroom. 16 MR. COCKRELL: I'm just 17 asking. 18 MS. STROM: Marisa, you can 19 answer. 20 A. Yeah, I mean what you're looking 21 at are conversations between colleagues 22 over a number of months to continue to 23 refine and improve and improve the</p>	<p>1 accuracy and ask questions to get more 2 information, to edit the article, so I 3 would say that I don't -- you know, I'm 4 not the person who investigated this so 5 I'm not in a position -- I'm not law 6 enforcement so I can't determine whether 7 there's proof or not. 8 My -- what I recall is that the 9 story did not report that she was locked 10 in the room, and that's why we have this 11 type -- that's why we have these types of 12 conversations to get closer to a more fair 13 and accurate report in the story. 14 Q. (By Mr. Cockrell) Do you remember 15 seeing where Katie Baker, after they had 16 sex climbed out a second story window and 17 climbed back down and had to jump on an 18 ice chest over an iron fence and to the 19 ground and then climbed back into the room 20 where the alleged rapist was? 21 Do you remember seeing that or 22 hearing that as part of Megan's statement 23 to law enforcement, actually to Adam Jones</p>
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<p>1 on the video? 2 A. At the beginning of the statement 3 I believe -- (phone rings). 4 Q. That was yours. 5 A. Sorry about that, it's those car 6 people. 7 Q. I know it. 8 A. I think at the beginning of the 9 statement -- (phone rings) -- 10 Q. It's okay. 11 A. I believe at the beginning of the 12 statement you said Katie Baker when I 13 think you -- when I'm assuming you meant 14 Megan Rondini when you were describing the 15 person -- 16 Q. Yes, I'm sorry. 17 A. -- I could have misheard you, but 18 that's what I heard so I just want to note 19 that that's just -- 20 Q. No, it was Megan Rondini's video 21 statement that you reviewed. Do you 22 remember her saying that she after they 23 had sex he was asleep, and she climbed out</p>	<p>1 the two-story window and down over on the 2 roof and over a picket fence and then onto 3 the ground, it was a picket iron fence, 4 and then climbed back up into the room 5 where the alleged rapist was? 6 Do you remember her saying that? 7 A. I have to admit, I know that I 8 watched the video and it was, you know, 9 eventually reviewed by multiple staff and 10 that included -- it was included in the 11 story but, you know -- I have to be 12 honest, after four years I don't remember 13 the details of the video. 14 Q. Do you consider that bizarre 15 behavior? 16 MS. STROM: Objection, 17 relevance. 18 But you can answer, Marisa. 19 A. I don't know enough -- again, I 20 don't remember the video. I'm kind of 21 confused about the chain of events. 22 I don't think I'm in a position to 23 say whether something is bizarre or not.</p>

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<p>1 Q. (By Mr. Cockrell) I ask the same 2 thing, do you consider it erratic 3 behavior? 4 A. Yeah, same answer, in 2021 I just 5 don't -- I just don't understand the 6 situation well enough to weigh in. 7 MR. COCKRELL: We offer 8 Plaintiff's Exhibit 61. 9 Okay, I think I've got that 10 covered already. 11 Q. This will be Plaintiff's 12 Exhibit 62 and it is BuzzFeed 2977. 13 Off the record. 14 (Off the record.) 15 (Whereupon, a document was marked 16 as Plaintiff's Exhibit No. 62 and 17 is attached to the original 18 transcript.) 19 A. I'm reading this now, thank you. 20 Okay, I'm ready to scroll down. 21 Okay, I'm ready. 22 Q. Okay. Looking down, it says 23 Marisa Carroll, note to self, where else</p>	<p>1 can we bring in the idea of being trapped. 2 Why did you say that? 3 A. I can't, I can't remember. 4 Q. Do you remember what was included 5 in the story that gave the idea that Megan 6 was trapped? 7 A. You know, I don't remember, and I 8 also don't know why it says that in the 9 final version of the story, so without 10 looking at it I just -- my memory isn't 11 jogged. 12 MR. COCKRELL: Okay. We 13 offer Plaintiff's Exhibit 62. 14 Q. What proof did BuzzFeed have that 15 you know of that Adam Jones and Josh 16 Hastings were building a case against 17 Megan Rondini for taking the gun, the 18 money and credit card of T. J. Bunn? 19 A. Are you speaking to a specific 20 line in the story or are you -- can you be 21 a little more specific, if possible? 22 Q. Well, there was a portion in the 23 story that said that little did Megan know</p>
Page 259	Page 260
<p>1 that the investigators were building a 2 case against her while they were asking 3 questions in the video when they came back 4 into the room. 5 MS. STROM: Objection. That 6 completely mischaracterizes the article. 7 Q. (By Mr. Cockrell) Go ahead and 8 answer the question. 9 A. I mean my recollection is that 10 that's not what that says, is that a case 11 was built, was built against her and that 12 I would point to, for instance, that the 13 felony packet is what we -- is what I 14 would say to that. 15 Q. Who built the case against Megan 16 Rondini? 17 A. Do you mean who would have like 18 read her her Miranda rights or who would 19 have put together the felony packet? I 20 just can't -- I don't know specifically 21 who if Megan was accused of a crime who 22 specific -- all the names of whoever would 23 it have been in the department doing it.</p>	<p>1 Q. Do you know who in law enforcement 2 built a case against Megan Rondini for 3 theft of the pistol and the credit card 4 and the money that she admitted to taking? 5 MS. STROM: Objection. 6 You can answer, Marisa. 7 A. I guess I don't understand what's 8 meant by building a case, but I just 9 don't, I also don't remember -- I don't 10 have an answer to that question I guess. 11 Q. (By Mr. Cockrell) Was it part of 12 your editing when you saw that portion of 13 the story that said building a case? Did 14 you review that? 15 A. I mean I would have reviewed every 16 line that ran in the published story. 17 Q. And approved of it? 18 A. This is a conversation we had 19 earlier. I'm one of multiple people who 20 would look at the story. 21 I guess I'm confused about the 22 general line of questioning here and how I 23 can be helpful in answering.</p>

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<p>1 Q. Okay.</p> <p>2 Do you know what law enforcement</p> <p>3 had to do if T. J. Bunn filed a complaint</p> <p>4 against Megan Rondini for taking his gun</p> <p>5 and taking his credit card and taking his</p> <p>6 money?</p> <p>7 MS. STROM: Objection.</p> <p>8 She's said over and over again she's not</p> <p>9 law enforcement, but go ahead, Marisa.</p> <p>10 A. Yeah, I'm not -- I am not law</p> <p>11 enforcement. I've never been to school</p> <p>12 for that. I don't want to speculate.</p> <p>13 MR. COCKRELL: We offer -- I</p> <p>14 don't think we put that one in.</p> <p>15 MS. STROM: If you're headed</p> <p>16 towards a new subject, maybe we could take</p> <p>17 a break.</p> <p>18 MR. COCKRELL: We can take a</p> <p>19 break. Let's take a short one though</p> <p>20 because I hope I'm not -- well, better</p> <p>21 take a good break if you want one.</p> <p>22 MS. STROM: Let's take a</p> <p>23 five-minute break.</p>	<p>1 VIDEOGRAPHER: Off the</p> <p>2 record at 3:09.</p> <p>3 (Recess was taken.)</p> <p>4 VIDEOGRAPHER: Back on the</p> <p>5 record at 3:19.</p> <p>6 Q. (By Mr. Cockrell) I'm going to</p> <p>7 show you, just show you BuzzFeed 3012.</p> <p>8 MS. STROM: What number are</p> <p>9 we at?</p> <p>10 MR. COCKRELL: I'm not going</p> <p>11 to introduce it as an exhibit, but it's</p> <p>12 BuzzFeed 3012.</p> <p>13 It's actually down at the</p> <p>14 bottom the page is what I'm interested in</p> <p>15 but you may want the read the whole thing.</p> <p>16 A. You can scroll down more. Okay,</p> <p>17 I've read it.</p> <p>18 Q. Okay. And at the bottom it says</p> <p>19 under suggestions Katie Baker Megan's case</p> <p>20 was complex, and then again most sexual</p> <p>21 assault cases are.</p> <p>22 There are rarely witnesses, and I</p> <p>23 don't have the rest of that, but would you</p>
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<p>1 agree that Megan's sexual assault and rape</p> <p>2 case was complex?</p> <p>3 A. I mean, I would agree with the</p> <p>4 comment here that I do think it's true</p> <p>5 that most sexual assault cases, and I'm</p> <p>6 not a law enforcement officer, but it</p> <p>7 seems like any time a criminal thing, a</p> <p>8 criminal thing is alleged is complicated.</p> <p>9 Q. It's a tough job, isn't it, in law</p> <p>10 enforcement to make complex cases?</p> <p>11 MS. STROM: Objection.</p> <p>12 A. I'm sorry, was that a question and</p> <p>13 I totally didn't answer the question?</p> <p>14 Q. (By Mr. Cockrell) No, it's okay.</p> <p>15 You don't have to. I would have told you.</p> <p>16 I'm sitting here reading this other</p> <p>17 document.</p> <p>18 A. I'm sorry.</p> <p>19 MR. COCKRELL: What exhibit</p> <p>20 did we leave off at?</p> <p>21 COURT REPORTER: 63. 63</p> <p>22 will be the next one.</p> <p>23 (Whereupon, a document was marked</p>	<p>1 as Plaintiff's Exhibit No. 63 is</p> <p>2 attached to the original</p> <p>3 transcript.)</p> <p>4 MR. COCKRELL: Plaintiff's</p> <p>5 Exhibit 63. Scotch, this document is</p> <p>6 3049.</p> <p>7 A. Is there scrolling to do on this</p> <p>8 one?</p> <p>9 Q. No. Do you see at the bottom it</p> <p>10 says Marisa Carroll add Megan's case did</p> <p>11 not meet Alabama standards for rape.</p> <p>12 Did you make that determination?</p> <p>13 MS. STROM: Objection.</p> <p>14 A. I mean, did I make the</p> <p>15 determination -- I didn't make any</p> <p>16 determination on Megan. I wasn't</p> <p>17 involved.</p> <p>18 I'm neither a lawyer nor a police</p> <p>19 officer, the DA. I'm not involved in</p> <p>20 making those kind of determinations.</p> <p>21 I know what the article describes</p> <p>22 is about Alabama's rape law itself, and</p> <p>23 the idea of earnest resistance and how in</p>

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<p>1 Megan's case that was referenced, so all I</p> <p>2 know is what's printed in the article.</p> <p>3 Q. (By Mr. Cockrell) And Alabama law</p> <p>4 would dictate in Megan's case, wouldn't</p> <p>5 it, just like you said?</p> <p>6 MS. STROM: Objection. I'm</p> <p>7 not sure she's an expert on the conflict</p> <p>8 of law, but go ahead.</p> <p>9 Q. (By Mr. Cockrell) I'm quoting</p> <p>10 here.</p> <p>11 A. I'll say I really don't know about</p> <p>12 laws and states -- I'm not a lawyer, but</p> <p>13 the article does talk about how -- about</p> <p>14 the law in Alabama, so I can say that I</p> <p>15 guess.</p> <p>16 Q. Okay. All right. I offer</p> <p>17 Plaintiff's Exhibit 63.</p> <p>18 I'm moving fast. I'm trying to</p> <p>19 cull them out so we can save a little</p> <p>20 time.</p> <p>21 This will be Plaintiff's</p> <p>22 Exhibit 64.</p> <p>23 (Whereupon, a document was marked</p>	<p>1 as Plaintiff's Exhibit No. 64 and</p> <p>2 is attached to the original</p> <p>3 transcript.)</p> <p>4 MR. COCKRELL: Scotch, it is</p> <p>5 3126.</p> <p>6 A. I'm ready for you to scroll down.</p> <p>7 I'm ready for you to scroll down. Okay.</p> <p>8 Q. (By Mr. Cockrell) Okay. Toward</p> <p>9 the middle of the page it says Marisa</p> <p>10 Carroll replace where are women who</p> <p>11 exhaust every path to justice, they're</p> <p>12 told to seek out supposedly -- supposed to</p> <p>13 do when they with -- with where women with</p> <p>14 imperfect stories must choose between</p> <p>15 keeping it to themselves or facing</p> <p>16 possible, and I don't have the rest of it,</p> <p>17 but Katie accepted your suggestion.</p> <p>18 Do you know that Megan's set of</p> <p>19 facts were imperfect?</p> <p>20 MS. STROM: Objection to the</p> <p>21 extent that this applies to the final</p> <p>22 article.</p> <p>23 But you can go ahead,</p>
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<p>1 Marisa.</p> <p>2 A. Yeah, I don't -- without this</p> <p>3 connected to something, it's hard for me</p> <p>4 to know exactly what it says or how we got</p> <p>5 from this point to what's printed in the</p> <p>6 end.</p> <p>7 Q. (By Mr. Cockrell) But knowing what</p> <p>8 you know about the case and having seen</p> <p>9 the video that you have seen, do you think</p> <p>10 Megan's case, set of facts, were</p> <p>11 imperfect?</p> <p>12 A. I mean as not a law enforcement</p> <p>13 officer, as just, you know, as just a</p> <p>14 person, I would say as we do see in the</p> <p>15 article and as we just discussed, it's</p> <p>16 complicated, right, and I guess that's</p> <p>17 what I would say is that all cases, all</p> <p>18 stories that I've heard of, at least, are</p> <p>19 complicated.</p> <p>20 Q. Okay. And it's complicated on law</p> <p>21 enforcement as well; isn't it?</p> <p>22 MS. STROM: Objection.</p> <p>23 A. My answer is that what we convey</p>	<p>1 in the story is that it is complicated,</p> <p>2 exactly it's for law enforcement dealing</p> <p>3 with these -- it's complicated for all</p> <p>4 involved.</p> <p>5 MR. COCKRELL: We would</p> <p>6 offer Plaintiff's Exhibit 64.</p> <p>7 Q. Would you agree that a pistol left</p> <p>8 on the ground in a residential</p> <p>9 neighborhood is a very serious thing, a</p> <p>10 loaded pistol?</p> <p>11 MS. STROM: Objection.</p> <p>12 Q. (By Mr. Cockrell) Especially where</p> <p>13 there's children.</p> <p>14 MS. STROM: You can answer.</p> <p>15 A. I mean, I just don't know how to</p> <p>16 answer that question.</p> <p>17 Q. (By Mr. Cockrell) Would you want</p> <p>18 your children to find a pistol laying on</p> <p>19 the side of the road in the grass in a</p> <p>20 residential neighborhood and the pistol?</p> <p>21 MS. STROM: Objection.</p> <p>22 She's testified she has no children but --</p> <p>23 Q. (By Mr. Cockrell) If you had</p>

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<p>1 children?</p> <p>2 A. I mean, again, I don't have</p> <p>3 children but I don't know where -- I guess</p> <p>4 my question is I don't know where the</p> <p>5 article says that it would be for kids to</p> <p>6 find a gun or something -- I guess I'm</p> <p>7 confused by that question.</p> <p>8 Q. Well, would that explain why</p> <p>9 Investigator Jones abruptly left the</p> <p>10 interview room --</p> <p>11 MS. STROM: Objection.</p> <p>12 Q. (By Mr. Cockrell) -- when Megan</p> <p>13 told him about the pistol, the loaded</p> <p>14 pistol, being left in the grass in a</p> <p>15 residential neighborhood?</p> <p>16 MS. STROM: Objection. To</p> <p>17 the extent she can know what Jones was</p> <p>18 thinking, please answer.</p> <p>19 A. Yeah, I just can't know what Jones</p> <p>20 was thinking and I just can't know.</p> <p>21 Q. (By Mr. Cockrell) Okay. When the</p> <p>22 post says you have a direct message from</p> <p>23 BuzzFeed team, is that still the Google</p>	<p>1 documents?</p> <p>2 A. Would it be possible for me to see</p> <p>3 that? I just can't -- I just can't know.</p> <p>4 Q. Show her 0489.</p> <p>5 A. I read this.</p> <p>6 Q. Is that more Google Docs?</p> <p>7 A. It says no reply at Slack.com.</p> <p>8 Q. Uh-huh (affirmative). What is</p> <p>9 Slack.com?</p> <p>10 A. Slack is a work -- how would you</p> <p>11 describe it? I guess it's like a way for</p> <p>12 jobs -- sorry, I'm not an expert on Slack.</p> <p>13 I guess a workplace chat software maybe.</p> <p>14 Q. A work -- I missed the last part.</p> <p>15 A what?</p> <p>16 A. A workplace announcements and chat</p> <p>17 platform.</p> <p>18 Q. Like a chat room or something?</p> <p>19 A. Not really like a chat room.</p> <p>20 Q. Is it Slack.com -- BuzzFeed</p> <p>21 Slack.com that's unique to BuzzFeed?</p> <p>22 A. So Slack is -- lots of different</p> <p>23 workplaces use Slack so this would have</p>
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<p>1 been BuzzFeed's, BuzzFeed only Slack,</p> <p>2 so --</p> <p>3 Q. Right, that's I'm asking --</p> <p>4 A. -- that was a corporate software</p> <p>5 where they would have contracted with</p> <p>6 Slack.</p> <p>7 Q. Right down there it says Katie</p> <p>8 Baker kind of reminds me of the Rondini</p> <p>9 piece reading about the NewYorker.com news</p> <p>10 story. Did Katie work on that story with</p> <p>11 Bill Cosby, do you know?</p> <p>12 A. I don't know. Not to my</p> <p>13 recollection because this is at the New</p> <p>14 Yorker, so that's a different news outlet.</p> <p>15 Q. Okay, all right.</p> <p>16 A. I also don't know what that story</p> <p>17 is.</p> <p>18 Q. Okay. I don't either.</p> <p>19 MR. COCKRELL: What's the</p> <p>20 next exhibit?</p> <p>21 COURT REPORTER: 65.</p> <p>22 MR. COCKRELL: Exhibit 65.</p> <p>23 (Whereupon, a document was marked</p>	<p>1 as Plaintiff's Exhibit No. 65 and</p> <p>2 is attached to the original</p> <p>3 transcript.)</p> <p>4 Q. And that is 3202.</p> <p>5 A. Okay. I'm ready for you to scroll</p> <p>6 down. Okay.</p> <p>7 Q. Who is -- I can't say that last.</p> <p>8 Sharmila Venkatasubban. Did I say that</p> <p>9 right?</p> <p>10 A. Sharmila was the fact checker on</p> <p>11 this story.</p> <p>12 Q. And she wrote in here, said I</p> <p>13 watched this over and over and I wonder if</p> <p>14 this description despite how toned down it</p> <p>15 is still misleads his intentions in any</p> <p>16 way.</p> <p>17 As I mentioned, I'm on the fence</p> <p>18 and certainly defer to all of you, of</p> <p>19 course, but I believe he left the room</p> <p>20 initially and made subsequent exits to</p> <p>21 make sure they found the stray gun lying</p> <p>22 in the grass in the residential</p> <p>23 neighborhood.</p>

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<p style="text-align: right;">Page 273</p> <p>1 And I don't know if he was 2 plotting to build a case against her 3 outside or what his responsibility to 4 investigate the handling and discharging 5 of the gun are. 6 As far as changing the line of 7 questions, those questions while hard, not 8 expressing any empathy for Megan, don't 9 seem out of line, but I'm the first to 10 admit I'm sure about any of this -- I'm 11 not sure about any of this. 12 Have you seen this before? 13 A. Yes, and I respond to her, so I 14 know that -- 15 Q. Were any changes made in the story 16 after she said that, Sharmila? 17 A. If you point to my response, I say 18 directly that I think she -- you know, 19 Sharmila can speak best for herself on 20 this one, but we didn't say in that line 21 that's being quoted that anyone built a 22 case against anyone. 23 And as I and Katie say in the</p>	<p style="text-align: right;">Page 274</p> <p>1 response, we don't want to speculate to 2 anyone's intentions so that's why it -- 3 that was our response to this note from 4 Sharmila. 5 Q. Did she ever tell you why she 6 believed it still misled his intentions? 7 A. All I know is that what she 8 describes in this comment. She could 9 speak I'm sure more specifically to what 10 she thought at the time and the conclusion 11 that she came to. 12 My recollection is that we came to 13 the conclusion that as is pointed out and 14 clear in this back and forth, this line 15 doesn't say that anyone built -- that he 16 built a case against Megan in this line. 17 Q. Is Sharmila still with BuzzFeed? 18 A. I don't believe so. 19 Q. Do you know where she's at now? 20 A. I don't remember. 21 Q. Were there any other fact checkers 22 for the story other than Sharmila or for 23 the Rondini story?</p>
<p style="text-align: right;">Page 275</p> <p>1 A. I remember Sharmila and it would 2 be unusual for there to be multiple fact 3 checkers on a single story. 4 Q. So as far as you know, there was 5 just one fact checker and that was 6 Sharmila for the Rondini story? 7 A. To the best of my recollection 8 that's true. But Sharmila or Katie or 9 Tina, someone else might have a different 10 answer, but that's what I remember. 11 Q. Okay. 12 MR. COCKRELL: We would 13 offer Plaintiff's Exhibit 65. 14 This is Plaintiff's 15 Exhibit 66. 16 (Whereupon, a document was marked 17 as Plaintiff's Exhibit No. 66 and 18 is attached to the original 19 transcript.) 20 Q. It is BuzzFeed 3209. 21 MS. BOLGER: You guys I'm a 22 little confused about exhibits so while 23 Marisa is reading that do you mind if we</p>	<p style="text-align: right;">Page 276</p> <p>1 start from like 62? 2 COURT REPORTER: Off the 3 record? 4 MR. COCKRELL: Yeah, go 5 ahead and tell her. 6 (Off-the-record discussion.) 7 A. I'm ready for you to scroll. 8 Please keep scrolling. 9 Actually if you don't mind could 10 you scroll up? I missed the very bottom 11 of the previous document. That's perfect. 12 Thank you. Okay, I've read this. 13 Q. (By Mr. Cockrell) Okay. Go down 14 where Sharmila says as a true victim, not 15 sure I agree with the police view him as 16 the true victim. 17 I think based on the materials 18 that they didn't push hard enough to 19 determine whether or not Megan was 20 assaulted and they took her handling of 21 his gun, taking of money at face value 22 meaning not within the context of how a 23 scared victim of sexual assault might try</p>

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<p>1 to protect theirself, everything examined</p> <p>2 just as minimally as they have to be</p> <p>3 before they move on.</p> <p>4 Marisa Carroll she admitted taking</p> <p>5 the money and gun while her report was</p> <p>6 deemed unfounded, he was the victim.</p> <p>7 Katie Baker, I believe he is also</p> <p>8 literally listed as a victim in the</p> <p>9 incident report in the felony packet.</p> <p>10 Sharmila says these laws are also</p> <p>11 better designed for majority of rape cases</p> <p>12 where victims know their attacker.</p> <p>13 DCH is long overdue for</p> <p>14 SANE forensic nurse program and</p> <p>15 recommended by department of justice</p> <p>16 leading national medical organization and</p> <p>17 external review of the Homicide Unit's</p> <p>18 policies and practices around</p> <p>19 investigating sexual assault might be in</p> <p>20 order, as well as inquiry into why it's so</p> <p>21 rare for prosecutors to move rape cases</p> <p>22 forward in Tuscaloosa.</p> <p>23 The University of Alabama could</p>	<p>1 strengthen its counseling services. Could</p> <p>2 all of that have been done without naming</p> <p>3 the investigator Adams Jones and Josh</p> <p>4 Hastings in the story?</p> <p>5 MS. STROM: Objection. I</p> <p>6 just want to say that I don't believe</p> <p>7 Sharmila's final comment is referring to</p> <p>8 the other comments above it, but go ahead,</p> <p>9 Marisa.</p> <p>10 A. Okay. My thought is those are --</p> <p>11 the comment you just read from Sharmila is</p> <p>12 separate from the other ones you were</p> <p>13 quoting, and I guess I don't understand --</p> <p>14 and I just don't understand the question.</p> <p>15 Q. (By Mr. Cockrell) I'll break it</p> <p>16 down for you.</p> <p>17 A. Thank you.</p> <p>18 Q. Could you have written a story</p> <p>19 about DCH not having a SANE program</p> <p>20 without including the investigators'</p> <p>21 names, personal names, in the story?</p> <p>22 MS. STROM: Objection to the</p> <p>23 extent you've asked why the investigators</p>
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<p>1 were named. It's been asked and answered,</p> <p>2 but go ahead and answer, Marisa.</p> <p>3 A. Sure, I can answer it again.</p> <p>4 I think it's important for readers</p> <p>5 to know that what we're reporting on is</p> <p>6 fair and accurate and true, and to the</p> <p>7 extent that police officers are public</p> <p>8 servants who are -- we're describing in</p> <p>9 their capacity as police officers</p> <p>10 investigating this particular incident, to</p> <p>11 the extent that we quote from and even</p> <p>12 include video from those interviews that</p> <p>13 were relevant to the story that we're</p> <p>14 telling it was important to include those</p> <p>15 names.</p> <p>16 Q. (By Mr. Cockrell) Could you have</p> <p>17 written an article criticizing their</p> <p>18 training without including the names of</p> <p>19 the investigators, Hastings and Jones?</p> <p>20 MS. STROM: Objection to the</p> <p>21 extent it mischaracterizes the article and</p> <p>22 she's already stated many times now why</p> <p>23 the investigators were mentioned in the</p>	<p>1 article.</p> <p>2 Q. (By Mr. Cockrell) You can answer.</p> <p>3 A. I mean what I would say this is a</p> <p>4 story about Megan Rondini and this is a</p> <p>5 story about Megan Rondini as a young woman</p> <p>6 who felt that she did everything that</p> <p>7 someone is supposed to do when they</p> <p>8 believe they've been raped.</p> <p>9 And she found that she was</p> <p>10 discouraged by institutions to the point</p> <p>11 that she ended up taking her own life, so</p> <p>12 I would say that -- I can't answer a</p> <p>13 hypothetical question of having a</p> <p>14 different story.</p> <p>15 I can only speak to the specific</p> <p>16 story that's Megan Rondini's story that</p> <p>17 we're talking about today.</p> <p>18 Q. Well, couldn't you have told Megan</p> <p>19 Rondini's story without including the</p> <p>20 names of the investigators, Adams and</p> <p>21 Jones?</p> <p>22 MS. STROM: Objection, asked</p> <p>23 and answered many times, but go ahead</p>

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<p>1 Marisa.</p> <p>2 A. I mean for the reason I said</p> <p>3 before, it's important for our readers to</p> <p>4 see their names in the context of them in</p> <p>5 their professional capacity working on the</p> <p>6 incident involving Megan Rondini and</p> <p>7 T. J. Bunn, so my answer is the same, that</p> <p>8 it was important and necessary in this</p> <p>9 story.</p> <p>10 Q. (By Mr. Cockrell) How would it</p> <p>11 have lessened the credibility of the story</p> <p>12 without using -- if you hadn't used their</p> <p>13 names?</p> <p>14 MS. STROM: Objection.</p> <p>15 Q. (By Mr. Cockrell) You could have</p> <p>16 just said investigators?</p> <p>17 MS. STROM: Objection. I'm</p> <p>18 just going to say -- sorry, it feels</p> <p>19 almost harassing at this point.</p> <p>20 This has been asked and</p> <p>21 answered so many times, but, Marisa, why</p> <p>22 don't you try it one more time.</p> <p>23 A. We quote the investigation and the</p>	<p>1 interviews. We include video from the</p> <p>2 investigation. These are officers who are</p> <p>3 acting in their public capacity in the</p> <p>4 public interest as law enforcement</p> <p>5 officers, and that is we -- I've now lost</p> <p>6 the question, but no, we needed to include</p> <p>7 their names. But if you could -- I'll</p> <p>8 take the question one more time if you can</p> <p>9 repeat --</p> <p>10 MR. COCKRELL: Would you</p> <p>11 read it back to her please?</p> <p>12 (Whereupon, requested portion was</p> <p>13 read back by court reporter.)</p> <p>14 A. We report things to be transparent</p> <p>15 and fair and accurate to the reader, and</p> <p>16 it's important for the reader to know that</p> <p>17 we're talking about real people.</p> <p>18 We're talking about real things</p> <p>19 that really happened and it's -- that's</p> <p>20 what makes our stories, our stories true</p> <p>21 for the reader is seeing that they really</p> <p>22 happened, that we're describing events,</p> <p>23 that we're quoting people that actually</p>
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<p>1 exist.</p> <p>2 Q. Well, if you said investigators,</p> <p>3 why would they think they didn't exist in</p> <p>4 your story, the reader?</p> <p>5 MS. STROM: Objection.</p> <p>6 Q. (By Mr. Cockrell) As opposed to,</p> <p>7 you know, their names?</p> <p>8 MS. STROM: Objection.</p> <p>9 You can answer, Marisa.</p> <p>10 A. I'll say again these are police</p> <p>11 officers who were acting in their role as</p> <p>12 police officers and it's important -- I</p> <p>13 mean, for the reasons I've described</p> <p>14 before, it's important to readers, that's</p> <p>15 a conclusion that we've come to as not</p> <p>16 only in this job, but it's a decision I've</p> <p>17 also made in other workplaces I've worked</p> <p>18 in on these types of stories.</p> <p>19 It is important and it's important</p> <p>20 and necessary for the reader to understand</p> <p>21 what -- that what we're talking about</p> <p>22 really happened.</p> <p>23 Q. (By Mr. Cockrell) What other</p>	<p>1 stories have you written about that you</p> <p>2 included the names of police</p> <p>3 investigators?</p> <p>4 A. I can say, to go back to our</p> <p>5 numbers before, more than ten. I would</p> <p>6 say like it is very common and for the</p> <p>7 purposes of presenting information to the</p> <p>8 public to include the names of police</p> <p>9 investigators and stories.</p> <p>10 Q. Can you name a particular story</p> <p>11 that I could look up?</p> <p>12 A. I don't want to misname a story</p> <p>13 but it's very -- it's very -- yeah, I</p> <p>14 can't remember the name of a story.</p> <p>15 MR. COCKRELL: We would</p> <p>16 offer Plaintiff's Exhibit 66.</p> <p>17 Q. Who is Katie Rayford?</p> <p>18 A. Katie Rayford, I can't remember</p> <p>19 her title, but was a colleague at BuzzFeed</p> <p>20 at the time.</p> <p>21 Q. And do you recall what she did for</p> <p>22 BuzzFeed?</p> <p>23 A. She worked in communications, but</p>

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<p>1 I don't want to misspeak to what her title</p> <p>2 or what her job looked like day-to-day.</p> <p>3 Q. Does she have any -- did she play</p> <p>4 a part in communicating the story when</p> <p>5 it's produced?</p> <p>6 MS. STROM: Objection.</p> <p>7 Sorry, what was the question? Could you</p> <p>8 just repeat it?</p> <p>9 MR. COCKRELL: Yeah, you</p> <p>10 have to repeat it for me.</p> <p>11 I'm sorry, and I'm not</p> <p>12 trying to harass you, I'm just trying to</p> <p>13 get through these documents.</p> <p>14 MS. STROM: No, no, I didn't</p> <p>15 mean to object. I just comes out of my</p> <p>16 mouth. I just didn't hear it.</p> <p>17 (Whereupon, requested portion was</p> <p>18 read back by court reporter.)</p> <p>19 MS. STROM: Objection. I</p> <p>20 guess I didn't understand what</p> <p>21 communicating the story meant.</p> <p>22 Q. (By Mr. Cockrell) I tell you what</p> <p>23 let's mark it. Sometimes it will save</p>	<p>1 time I think if I just mark all of this.</p> <p>2 What's the exhibit number?</p> <p>3 COURT REPORTER: 67.</p> <p>4 MR. COCKRELL: That's the</p> <p>5 disadvantage of doing it this way.</p> <p>6 All right. This is 1703.</p> <p>7 (Whereupon, a document was marked</p> <p>8 as Plaintiff's Exhibit No. 67 and</p> <p>9 is attached to the original</p> <p>10 transcript.)</p> <p>11 A. Okay, I can scroll. Okay, I read</p> <p>12 this. I don't know if there's more.</p> <p>13 Q. Okay. Does that refresh your</p> <p>14 memory what Katie Rayford did or does for</p> <p>15 BuzzFeed?</p> <p>16 A. Yeah, based off of this email she</p> <p>17 works in -- I forget, I don't know her</p> <p>18 title, but she -- by working in</p> <p>19 communications she coordinates, for</p> <p>20 instance, interviews between journalist at</p> <p>21 BuzzFeed and other news outlets.</p> <p>22 Q. Okay. Would that -- would she be</p> <p>23 the one in her department to help get</p>
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<p>1 stories out to other news outlets to be</p> <p>2 spread to the public?</p> <p>3 A. My understanding is that Matthew</p> <p>4 Mittenhal, who is cc'd on this email, was</p> <p>5 the head of the department so they both</p> <p>6 worked on it and there were many people in</p> <p>7 the communications department.</p> <p>8 Q. But did they do what I just said?</p> <p>9 I can read back if you want to get --</p> <p>10 A. Yes, people in the communications</p> <p>11 department would, for instance, help a</p> <p>12 reporter do an interview with another news</p> <p>13 outlet to talk about their story.</p> <p>14 Q. And the chief goal being what, by</p> <p>15 doing this?</p> <p>16 A. I think the goal being as people</p> <p>17 who do stories in the public interest to</p> <p>18 share those stories with the public.</p> <p>19 Q. Okay. All right. Down here</p> <p>20 toward the bottom it says Marisa Carroll</p> <p>21 has invited you to edit the following</p> <p>22 document, reporting rape in Tuscaloosa</p> <p>23 5/5/2017.</p>	<p>1 A story that Katie's been working</p> <p>2 on all year comes out this week, most</p> <p>3 likely Thursday. Can share with you on</p> <p>4 the CMS link tomorrow when we have it.</p> <p>5 It's about a college student from</p> <p>6 the University of Alabama who told police</p> <p>7 that the most powerful man in town raped</p> <p>8 her and who was ultimately driven to PTSD</p> <p>9 and suicide through the process, very</p> <p>10 explosive story about weak rape laws and</p> <p>11 policing in Alabama.</p> <p>12 Happy to talk about how to promote</p> <p>13 promo but definitely good for Alabama and</p> <p>14 women focused outlets. What is a CMS</p> <p>15 link?</p> <p>16 A. The CMS is the back end of a</p> <p>17 website. So the CMS link is looking at</p> <p>18 how a story before it's published looking</p> <p>19 at the preview draft of it.</p> <p>20 Q. Okay. Would this be a preview</p> <p>21 draft here that I just read to you?</p> <p>22 A. No. So a CMS link is a -- imagine</p> <p>23 so the CMS is like the under the hood of</p>

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<p>1 when you read a live website.</p> <p>2 So a CMS link would just be the</p> <p>3 actual story itself laid out, but not yet</p> <p>4 published, so it would be a link where you</p> <p>5 and I if we didn't work somewhere couldn't</p> <p>6 have seen it, but the individuals who were</p> <p>7 working on it the project could see it.</p> <p>8 Q. Okay. And what did you mean by</p> <p>9 weak policing in Alabama?</p> <p>10 A. My read of this paragraph is I say</p> <p>11 weak rape laws and then separately say</p> <p>12 policing. An explosive story about weak</p> <p>13 rape laws and policing in Alabama.</p> <p>14 But this is an email I wrote again</p> <p>15 four years ago.</p> <p>16 Q. I got you. What is a blast list?</p> <p>17 A. That is a better question for</p> <p>18 Katie Rayford.</p> <p>19 Q. Do you know what it is?</p> <p>20 A. Reading this email, I would assume</p> <p>21 it's people who -- reading my previous</p> <p>22 email it looks like people who she alerts</p> <p>23 a story to but I really -- I've never</p>	<p>1 worked in PR, so I don't know what that</p> <p>2 sort of term of art is.</p> <p>3 Q. Okay.</p> <p>4 Offer 67.</p> <p>5 Who is Megan Paolone?</p> <p>6 A. Megan Paolone was a copy editor at</p> <p>7 BuzzFeed.</p> <p>8 MR. COCKRELL: I'll pass on</p> <p>9 that one. We'll mark this Plaintiff's</p> <p>10 Exhibit 68.</p> <p>11 (Whereupon, a document was marked</p> <p>12 as Plaintiff's Exhibit No. 68 and</p> <p>13 is attached to the original</p> <p>14 transcript.)</p> <p>15 Q. And it is 626.</p> <p>16 A. Okay, I've read it.</p> <p>17 Q. Okay. And you sent this email --</p> <p>18 I guess it's email -- to Ben King?</p> <p>19 A. It looks like that, yeah.</p> <p>20 Q. So this is an email directly to</p> <p>21 him?</p> <p>22 A. Looks like it's to him and Tina</p> <p>23 Susman.</p>
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<p>1 Q. All right. What was so</p> <p>2 interesting when you discussed the clip of</p> <p>3 Megan being read her Miranda rights?</p> <p>4 A. What was so interesting about the</p> <p>5 clip?</p> <p>6 Q. Yeah, just the clip.</p> <p>7 A. Honestly, I can't remember.</p> <p>8 Looking back at it it seems like it was</p> <p>9 too quiet to hear it, but I can't remember</p> <p>10 what -- you know, shot in the dark,</p> <p>11 someone being read their Miranda rights</p> <p>12 that's relevant to the story and quoted in</p> <p>13 the story, but I can't remember at the</p> <p>14 time.</p> <p>15 Q. When you said it was not doing</p> <p>16 what we originally hoped it would, what</p> <p>17 did you mean by that?</p> <p>18 A. Same answer, I don't remember what</p> <p>19 I meant by what we originally hoped it</p> <p>20 would. I do know that the Miranda rights</p> <p>21 comes up in the story, and we tend to use</p> <p>22 video and visual aids to show what happens</p> <p>23 in a story, but I don't remember what I</p>	<p>1 mean by what we originally hoped it would.</p> <p>2 Q. Okay. Who is Sara Yasmin,</p> <p>3 Y-a-s-m-i-n?</p> <p>4 A. I don't know who Sara Y-a-s -- is</p> <p>5 it Sara Y-a-s-i-n?</p> <p>6 Q. Uh-huh (affirmative), did I say</p> <p>7 that? I hope I spelled it right.</p> <p>8 A. She works at BuzzFeed. I do not</p> <p>9 remember what her title is though.</p> <p>10 Q. What is a newsletter copy?</p> <p>11 A. I don't know. Is there more --</p> <p>12 like a full sentence?</p> <p>13 Q. It's just bold letters, newsletter</p> <p>14 copy, and then something underneath that</p> <p>15 says when an Alabama college student told</p> <p>16 the police --</p> <p>17 MS. STROM: Sorry, Bob, why</p> <p>18 don't you show her the document so we can</p> <p>19 get some context?</p> <p>20 MR. COCKRELL: All right.</p> <p>21 Okay.</p> <p>22 We ain't got many more, so</p> <p>23 that's good. 69.</p>

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<p>1 (Whereupon, a document was marked 2 as Plaintiff's Exhibit No. 69 and 3 is attached to the original 4 transcript.) 5 Q. Okay. It is 716. 6 A. Okay, I've read this. 7 Q. Okay. I guess does that refresh 8 your memory? 9 A. Now, I can answer the question. 10 Q. Okay. 11 A. So newsletter copy like everything 12 -- we want to make sure that everything 13 that we publish has gone through multiple 14 levels of review. 15 Sara Yasin was an editor who 16 worked on many things, including the 17 BuzzFeed newsletter, that would talk about 18 stories that were coming out. 19 So when it comes to sharing 20 newsletter copy that's something where we 21 want to make sure that if BuzzFeed is 22 publishing anything, it doesn't disagree 23 or make implications and so on that's</p>	<p>1 different than what's in the story. 2 So newsletter copy the editors and 3 writers of a story would review and so 4 would our legal team, so it was sort of a 5 back and forth process to try to make sure 6 that not only -- it didn't end in the 7 story, that the way that it was being 8 described in say a BuzzFeed newsletter was 9 also fair and accurate. 10 Q. And what is a push alert? 11 A. A push alert is a little -- I'll 12 see if there's one on my phone. There's 13 not. It's when a little bloop comes up on 14 your phone, and it's from a news outlet 15 and it tells you that almost a longer 16 version of a headline of a story. 17 Q. So who would receive a push alert 18 on the Rondini case? Excuse me, on the 19 Rondini case? 20 A. Sure. Someone like Sara would be 21 better able to describe it. My 22 understanding is that push alerts go to 23 anyone who on their phone says they want</p>
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<p>1 the push alerts from a certain news 2 outlet. 3 Q. Would it be the general public or 4 would it be other news outlets that 5 receive the push alert? Who receives 6 them? 7 A. People in the -- all sorts of 8 people. If you have a phone I think it's 9 -- I don't remember if it's only an iPhone 10 or other phones, you can ask for push 11 alerts. 12 Q. So somebody can get on BuzzFeed 13 website and ask for push alerts? 14 A. I believe you ask -- you sign up 15 for push alerts through your phone so not 16 through the website, through maybe -- I 17 have to admit I have push alerts I don't 18 know how to turn off and I don't know how 19 to turn them on, but I do know they come 20 to your phone and it's not just for staff. 21 Q. So it could be anybody in the 22 general public that gets an app or 23 whatever on their phone, they could</p>	<p>1 receive it? 2 A. Sure, anyone who signs up and 3 requests getting BuzzFeed push alerts 4 would get push alerts and the same is true 5 for other news outlets, if you sign up. 6 Though, I know I also have push 7 alerts on my phone that I didn't sign up 8 for and Apple thinks that I want them so I 9 don't really -- I don't know how the 10 technology of it all works. 11 Q. I get them, too, and I didn't know 12 they were called push alerts, and don't 13 like it. 14 Down at the bottom it says, hi, 15 Sara, here are some possible promo 16 language. What did you mean by promo 17 language? 18 A. I'm sorry, could we scroll down 19 more? Because I missed that part. 20 Promo language like as it -- we 21 can discuss -- since this sentence implies 22 that it wasn't talking about tweets, I 23 would guess it probably means the types of</p>

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<p>1 things that we have in newsletter copy are</p> <p>2 push alert, so like, you know, language</p> <p>3 that summarizes the story for readers.</p> <p>4 Q. I missed that last part.</p> <p>5 Glamorizes did you say?</p> <p>6 A. Summarizes.</p> <p>7 Q. Summarizes.</p> <p>8 A. So similarly to a headline,</p> <p>9 similarly to seeing a headline where you</p> <p>10 get information on the story.</p> <p>11 Q. Okay. Do you know what badged,</p> <p>12 b-a-d-g-e-d, trending means?</p> <p>13 A. This is another one of those</p> <p>14 things where could you use it in a</p> <p>15 sentence?</p> <p>16 Q. Yeah, I'm going to give this to</p> <p>17 you. Pull up 03719 and let her look at</p> <p>18 it.</p> <p>19 COURT REPORTER: And we're</p> <p>20 not going to mark it?</p> <p>21 MR. COCKRELL: No, we're not</p> <p>22 going to mark it.</p> <p>23 A. I can tell you that I've heard</p>	<p>1 this term before, but I don't understand</p> <p>2 it and someone else from BuzzFeed who has</p> <p>3 a better understanding of the CMS, like I</p> <p>4 described before, the sort of back end of</p> <p>5 BuzzFeed, could answer it better.</p> <p>6 Q. Okay, that's fair enough.</p> <p>7 A. I just can't wager a guess.</p> <p>8 Q. What is the viral dashboard?</p> <p>9 A. That's another one where I don't</p> <p>10 know or remember what that is.</p> <p>11 Q. Okay. All right. I take that</p> <p>12 back. We didn't offer.</p> <p>13 COURT REPORTER: Okay, just</p> <p>14 want to make sure.</p> <p>15 MR. COCKRELL: All right.</p> <p>16 Let's take a break and I'll be right back</p> <p>17 trying to short circuit and see there's</p> <p>18 anything else I need to.</p> <p>19 MS. STROM: Okay.</p> <p>20 VIDEOGRAPHER: Off the</p> <p>21 record at 4:12.</p> <p>22 (Recess was taken.)</p> <p>23 VIDEOGRAPHER: Back on the</p>
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<p>1 record at 4:20.</p> <p>2 Q. (By Mr. Cockrell) Why was a law</p> <p>3 enforcement officer or a lawyer quote</p> <p>4 regarding sexual assault or rape law not</p> <p>5 included in the article?</p> <p>6 MS. STROM: Objection. I'm</p> <p>7 sorry, can you just repeat that?</p> <p>8 MR. COCKRELL: Can you read</p> <p>9 it back to her?</p> <p>10 (Whereupon, requested portion was</p> <p>11 read back by court reporter.)</p> <p>12 MS. STROM: I think it</p> <p>13 mischaracterized --</p> <p>14 MS. BOLGER: We quote law</p> <p>15 enforcement --</p> <p>16 MS. STROM: Yeah, we quote</p> <p>17 law enforcement in the article. I guess</p> <p>18 I'm confused because that doesn't seem to</p> <p>19 reflect the article that I read.</p> <p>20 Q. (By Mr. Cockrell) Did you -- you</p> <p>21 didn't quote assault or rape law in</p> <p>22 Alabama though, did you?</p> <p>23 MS. STROM: Objection.</p>	<p>1 Q. (By Mr. Cockrell) Let me rephrase</p> <p>2 the question, okay. Let me try it again.</p> <p>3 Why didn't you include a statement</p> <p>4 from an attorney or a law enforcement</p> <p>5 officer or a quote from one of the other</p> <p>6 regarding what the sexual assault law or</p> <p>7 rape law was in Alabama?</p> <p>8 MS. STROM: Objection,</p> <p>9 mischaracterizes the article to the extent</p> <p>10 that law enforcement isn't quoted</p> <p>11 extensively throughout the article, but go</p> <p>12 ahead.</p> <p>13 A. Yeah, I mean we quote law</p> <p>14 enforcement throughout the article, so</p> <p>15 don't -- I guess I just disagree with the</p> <p>16 premise of the question.</p> <p>17 Q. (By Mr. Cockrell) Did you get a</p> <p>18 quote from law enforcement or a lawyer</p> <p>19 about what the actual elements of assault</p> <p>20 or rape in Alabama was in order to have</p> <p>21 somebody arrested?</p> <p>22 MS. STROM: Objection,</p> <p>23 mischaracterizes the article.</p>

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<p>1 But go ahead, Marisa.</p> <p>2 A. Now, I'm -- would the -- ma'am,</p> <p>3 would you mind repeating the -- reading</p> <p>4 the question again?</p> <p>5 (Whereupon, requested portion was</p> <p>6 read back by court reporter.)</p> <p>7 A. I can say that Katie Baker did in</p> <p>8 the many months she reported this story</p> <p>9 did report including through interviews</p> <p>10 with law enforcement, including quotes</p> <p>11 that are included in the final story,</p> <p>12 about what -- about this and it's</p> <p>13 reflected in the final story and in</p> <p>14 Katie's, you know, if one were to look at</p> <p>15 Katie's reporting notes and the way that</p> <p>16 someone produces those quotes, for</p> <p>17 instance, in emails with Gary Hood.</p> <p>18 Q. (By Mr. Cockrell) So it's your</p> <p>19 testimony that law enforcement explained</p> <p>20 in the article by way of a quote what the</p> <p>21 rape law was and the sexual assault law</p> <p>22 was in the state of Alabama at the time</p> <p>23 this story was published?</p>	<p>1 A. I can say that the story includes</p> <p>2 relevant quotes from law enforcement</p> <p>3 regarding this case that we're talking</p> <p>4 about in the story.</p> <p>5 I guess I'm just confused about</p> <p>6 how to answer the question otherwise.</p> <p>7 Q. I guess I would just ask you a</p> <p>8 simple question --</p> <p>9 A. I believe the story does do what</p> <p>10 it is you're saying, but I just don't</p> <p>11 know, I'm confused.</p> <p>12 Q. Why specifically was a quote not</p> <p>13 put in the story from a lawyer or from an</p> <p>14 experienced law enforcement officer about</p> <p>15 what the elements of sexual assault or</p> <p>16 rape was at the time in the state of</p> <p>17 Alabama?</p> <p>18 MS. STROM: Objection.</p> <p>19 Mischaracterizes the article, but you can</p> <p>20 answer, Marisa.</p> <p>21 Bob, would it be helpful to</p> <p>22 put the article in front of her so she can</p> <p>23 read the article?</p>
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<p>1 MR. COCKRELL: I'm just</p> <p>2 asking why it wasn't included.</p> <p>3 MS. STROM: Right, but she</p> <p>4 says she doesn't agree with that, so we</p> <p>5 can either move on or you could put the</p> <p>6 article in front of her, but she's said</p> <p>7 already that she doesn't agree with you --</p> <p>8 MR. COCKRELL: Can you put</p> <p>9 the article up, Scotch, where she can look</p> <p>10 at it?</p> <p>11 A. Excuse me, would you mind zooming</p> <p>12 in a couple? You can move on the next</p> <p>13 page please. Thank you. You can keep</p> <p>14 scrolling please. Thank you.</p> <p>15 I guess should I stop when I can I</p> <p>16 explain why I disagree --</p> <p>17 Q. Sure.</p> <p>18 A. -- because there's a couple of</p> <p>19 different points. If you scroll up a</p> <p>20 little bit.</p> <p>21 We do include the investigator who</p> <p>22 interviewed Megan quickly decided she</p> <p>23 hadn't fought back against Bunn, she</p>	<p>1 hadn't kicked or hit him.</p> <p>2 This is in a paragraph about rape</p> <p>3 law in Alabama, but if you continue to go</p> <p>4 down to where she interviews Gary Hood.</p> <p>5 So we do have Hood here -- sorry, could</p> <p>6 you scroll up first?</p> <p>7 Sorry. I mean, here's one spot</p> <p>8 where if we go throughout there's, you</p> <p>9 know, here's a spot where Hood</p> <p>10 specifically is describing special</p> <p>11 inquiries and describing what the law</p> <p>12 means in Alabama.</p> <p>13 And if you keep scrolling down, he</p> <p>14 further explains himself and why there</p> <p>15 were a lot of reasons a college student</p> <p>16 might not -- might lie about rape.</p> <p>17 Q. (By Mr. Cockrell) Would you agree</p> <p>18 with me that he didn't say the elements</p> <p>19 that are required to be proven under</p> <p>20 Alabama law in this quote to prove rape or</p> <p>21 sexual assault so an arrest could be made?</p> <p>22 A. I mean I would disagree with the</p> <p>23 idea that having paragraphs including</p>

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<p>1 quotes directly from Hood don't say</p> <p>2 exactly what you mean, and I think if we</p> <p>3 keep scrolling down, I'm happy to keep</p> <p>4 looking at the rest of the article and</p> <p>5 pointing out examples, but I just don't</p> <p>6 agree.</p> <p>7 Q. Is there anywhere in this article</p> <p>8 where a law enforcement officer or an</p> <p>9 attorney is quoted specifically explaining</p> <p>10 what the elements of the crime of assault</p> <p>11 and -- sexual assault or rape in order for</p> <p>12 an arrest to be made by somebody in the</p> <p>13 state of Alabama?</p> <p>14 A. Yeah, Gary Hood. Gary Hood in the</p> <p>15 story I remember, and you can search for</p> <p>16 this, but I remember the line was he</p> <p>17 described her lack of earnest resistance,</p> <p>18 and if you look -- if you take us to that</p> <p>19 point we can read that.</p> <p>20 Q. Scroll on down, Scotch.</p> <p>21 A. You can keep scrolling. Sorry,</p> <p>22 I'm trying to read.</p> <p>23 And it says here in an email to</p>	<p>1 BuzzFeed, Captain Hood outlined the holes</p> <p>2 he saw in Megan's story, many of which had</p> <p>3 to do with what he said was her, quote,</p> <p>4 lack of earnest resistance.</p> <p>5 Even though she said she blacked</p> <p>6 out for part of the night she quote</p> <p>7 admitted to being coherent.</p> <p>8 Even though he claims she</p> <p>9 repeatedly told Bunn she wanted to leave</p> <p>10 she never said no. So this is I mean</p> <p>11 directly where -- and then in the next</p> <p>12 paragraph, the authorities weren't just</p> <p>13 required to follow Alabama rape law, Hood</p> <p>14 said, they were legally obligated, another</p> <p>15 quote, to investigate the felonies Megan</p> <p>16 admitted to committing during her</p> <p>17 interview, although she -- and then if you</p> <p>18 go down, Hood says, although she didn't,</p> <p>19 quote, realize she committed a crime, does</p> <p>20 not negate the fact that she did commit</p> <p>21 the crime.</p> <p>22 So I guess that's why I have a</p> <p>23 different interpretation than your</p>
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<p>1 question, because I do think we</p> <p>2 extensively quote exactly what you're</p> <p>3 saying which is explaining the rape law,</p> <p>4 the difficulty of investigating these</p> <p>5 stories and -- this is -- I guess that's</p> <p>6 my answer to the question is that I really</p> <p>7 feel passionately that we do.</p> <p>8 Q. (By Mr. Cockrell) Okay. All</p> <p>9 right. Let's see what else we've got</p> <p>10 here.</p> <p>11 Is there any particular reason you</p> <p>12 left out all of the other investigators'</p> <p>13 names in the story that worked on the</p> <p>14 case?</p> <p>15 A. I can't answer that question --</p> <p>16 you know, don't have an answer to that</p> <p>17 question. We're talking about</p> <p>18 investigators' names for instance that are</p> <p>19 in the interview video.</p> <p>20 Q. In the interest of truth, is there</p> <p>21 any reason why you didn't view the full</p> <p>22 video clips of the interviews that were</p> <p>23 taken by the investigators?</p>	<p>1 A. To my earlier point, I did -- to</p> <p>2 my recollection I saw those full videos.</p> <p>3 Q. And who decided what would stay in</p> <p>4 and what would be kept out?</p> <p>5 A. As we talked about before, it was</p> <p>6 a discussion between multiple people</p> <p>7 involved in the project, right, it was</p> <p>8 myself, Tina Susman, Katie Baker, Sharmila</p> <p>9 so multiple people were involved in</p> <p>10 deciding that.</p> <p>11 Q. And y'all all formed a consensus?</p> <p>12 A. And I can say for across this</p> <p>13 article it was -- it's about forming a</p> <p>14 consensus, yes.</p> <p>15 Q. Okay. All right. If the story</p> <p>16 was not about the investigation, why did</p> <p>17 you quote the IACP, International</p> <p>18 Association of Chief of Police, in the</p> <p>19 article?</p> <p>20 A. I mean the story is about -- the</p> <p>21 story is about Megan Rondini, and Megan</p> <p>22 Rondini's story and her process of</p> <p>23 reporting what she believed was a sexual</p>

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<p>1 assault to the police, to the school, to</p> <p>2 the therapist at the school, so I guess I</p> <p>3 would disagree with your description of</p> <p>4 the article.</p> <p>5 Q. Then why was the article even</p> <p>6 included if that was true? I mean why was</p> <p>7 the quote from the International</p> <p>8 Association of Chief of Police included in</p> <p>9 that was true?</p> <p>10 MS. STROM: I'm sorry, if</p> <p>11 what was true?</p> <p>12 Q. (By Mr. Cockrell) What she just</p> <p>13 said, that it was all about Megan Rondini.</p> <p>14 MS. STROM: Objection, but</p> <p>15 go ahead, Marisa.</p> <p>16 A. I said the story is about Megan</p> <p>17 Rondini's process of reporting a sexual</p> <p>18 assault to the police and to her school.</p> <p>19 And she ultimately became so --</p> <p>20 you know, from her perspective so</p> <p>21 discouraged by the process that she</p> <p>22 committed suicide, so I think that like,</p> <p>23 as we've discussed on other elements</p>	<p>1 throughout the day today, that feels</p> <p>2 completely relevant to me.</p> <p>3 Q. Why was it necessary and why is it</p> <p>4 relevant to have included that quote from</p> <p>5 the International Association of Chief of</p> <p>6 Police if it wasn't about the</p> <p>7 investigation?</p> <p>8 MS. STROM: Objection.</p> <p>9 You're mischaracterizing her testimony.</p> <p>10 Also I don't know if you want to ask her</p> <p>11 if it's necessary or relevant, but you're</p> <p>12 completely mischaracterizing her</p> <p>13 testimony.</p> <p>14 Q. (By Mr. Cockrell) I'll stay with</p> <p>15 my question. You can answer.</p> <p>16 MS. STROM: Marisa, feel</p> <p>17 free to repeat your answer.</p> <p>18 MR. COCKRELL: I appreciate</p> <p>19 you -- I like you, but please don't answer</p> <p>20 for her, okay.</p> <p>21 A. I'm answering for myself. What</p> <p>22 I'm saying is that this is a story about</p> <p>23 Megan Rondini's process of reporting what</p>
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<p>1 she believed to be a sexual assault to the</p> <p>2 police, to her school, and that it was so</p> <p>3 discouraging that she ultimately committed</p> <p>4 suicide.</p> <p>5 This has been the same way that we</p> <p>6 talked about experts and the same we</p> <p>7 talked about all of this that feels</p> <p>8 completely -- I don't know how it wouldn't</p> <p>9 be relevant. That seems completely</p> <p>10 relevant to me.</p> <p>11 Q. Well, were you saying by quoting</p> <p>12 the International Chief of Police that the</p> <p>13 investigation was inadequate into Megan's</p> <p>14 case?</p> <p>15 MS. STROM: Objection.</p> <p>16 A. I would say that I'm not -- I'm</p> <p>17 not a police officer. I'm not a sheriff.</p> <p>18 What my job is is to present information</p> <p>19 that's in the public interest to readers</p> <p>20 who can then read a story and draw their</p> <p>21 own conclusions.</p> <p>22 Q. (By Mr. Cockrell) So why include</p> <p>23 that article, that quote at all from the</p>	<p>1 International Association of Chief of</p> <p>2 Police?</p> <p>3 A. I mean I can say again this is a</p> <p>4 story, as I look at it, about Megan</p> <p>5 Rondini and about Megan Rondini's process</p> <p>6 of reporting what she believed to be a</p> <p>7 sexual assault to police and to her</p> <p>8 school, so it feels completely relevant to</p> <p>9 me to -- so that quoting the International</p> <p>10 Chief of Police on this topic doesn't seem</p> <p>11 irrelevant at all.</p> <p>12 Q. Who found that quote from the</p> <p>13 International Chief of Police to include</p> <p>14 it in the story?</p> <p>15 A. I can't remember that.</p> <p>16 Q. Did you provide it?</p> <p>17 A. Same answer; I can't remember</p> <p>18 that.</p> <p>19 Q. Do you know who would have</p> <p>20 researched it to come up with that</p> <p>21 article, that quote from the International</p> <p>22 Chief of Police?</p> <p>23 MS. STROM: Objection, asked</p>

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<p>1 and answered.</p> <p>2 Go ahead, Marisa.</p> <p>3 A. And same answer, I can't -- I</p> <p>4 can't remember where this -- this is a</p> <p>5 story reported by Katie Baker, edited by</p> <p>6 two editors with a fact checker involved.</p> <p>7 I just can't remember back to the origin</p> <p>8 of that quote.</p> <p>9 Q. (By Mr. Cockrell) Okay. All</p> <p>10 right. Normally who would it be when you</p> <p>11 write an article on sexual assault or rape</p> <p>12 that would find quotes like this for you</p> <p>13 guys at BuzzFeed?</p> <p>14 MS. STROM: Objection. You</p> <p>15 can answer, Marisa, to the extent you</p> <p>16 understand.</p> <p>17 A. So when we're working on stories</p> <p>18 it's -- a reporter is reporting and</p> <p>19 reading and researching and writes a story</p> <p>20 and that's a draft of a story.</p> <p>21 And then from there other people</p> <p>22 like a fact checker or like an editor look</p> <p>23 at the story and occasionally they'll make</p>	<p>1 suggestions like having, you know, having</p> <p>2 researched this additionally, for whatever</p> <p>3 reason they might suggest to include</p> <p>4 something, but stories are drafted and</p> <p>5 written by reporters who work there.</p> <p>6 Q. What did you think the quote from</p> <p>7 the International Association of Police</p> <p>8 Chief added to the story?</p> <p>9 A. Would you mind reading it back to</p> <p>10 me?</p> <p>11 MS. STROM: Why don't you</p> <p>12 put the article up and show it in context</p> <p>13 of the article? Can you go to the</p> <p>14 relevant portion of the article?</p> <p>15 MR. RITCHEY: It's there.</p> <p>16 A. From here would -- I see this part</p> <p>17 of -- I've read this part of the screen.</p> <p>18 Can you tell what -- sorry, I'm sorry,</p> <p>19 could you please just rephrase the</p> <p>20 question more or just repeat the question,</p> <p>21 whichever?</p> <p>22 MR. COCKRELL: Go ahead and</p> <p>23 repeat the question please. Read it back</p>
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<p>1 to her.</p> <p>2 (Whereupon, requested portion was</p> <p>3 read back by court reporter.)</p> <p>4 Q. (By Mr. Cockrell) And in here I'm</p> <p>5 reading it says but the IACP tells police</p> <p>6 not to pressure victims to make any</p> <p>7 decisions about prosecution during the</p> <p>8 initial stages of an investigation.</p> <p>9 Doing so is poor practice and</p> <p>10 potentially damaging to an agency as</p> <p>11 guidelines state. So what was the purpose</p> <p>12 in including that quote?</p> <p>13 A. Including exactly what you read</p> <p>14 back, we include quotes to include them if</p> <p>15 they are relevant to the public interest</p> <p>16 and if they're relevant to a reader</p> <p>17 reading a story, so we included it to</p> <p>18 convey the information you just read to</p> <p>19 me.</p> <p>20 Q. What was it you were trying to</p> <p>21 show the reader?</p> <p>22 A. My job is to give the reader</p> <p>23 relevant -- what we seem to be relevant</p>	<p>1 information and that the reader can then</p> <p>2 read through and draw and take away from</p> <p>3 the article what they will.</p> <p>4 Q. What was it that you thought the</p> <p>5 readers would get out of that quote?</p> <p>6 A. So they would know what the</p> <p>7 International Association of Chief of</p> <p>8 Police says.</p> <p>9 Q. And how was that related to</p> <p>10 Investigator Jones?</p> <p>11 MS. STROM: Objection.</p> <p>12 A. I don't think I or the article say</p> <p>13 that so I can't answer that.</p> <p>14 Q. (By Mr. Cockrell) Okay. All</p> <p>15 right.</p> <p>16 What would be purpose of adding</p> <p>17 drama to an investigative report story?</p> <p>18 MS. STROM: Objection.</p> <p>19 A. I don't understand the question.</p> <p>20 Q. (By Mr. Cockrell) Well, we've read</p> <p>21 several and looked at today where it</p> <p>22 talked about for more dramatic effect.</p> <p>23 Do it this way, why would -- what</p>

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<p>1 would the purpose be of adding drama to an 2 investigative report? 3 MS. STROM: Objection. 4 A. Characterization of several -- I 5 just disagree with the way that you're 6 characterizing what we talked about 7 earlier. 8 Q. (By Mr. Cockrell) Well, just in 9 general, what would be the purpose of 10 adding drama to an investigative report? 11 MS. STROM: Objection. You 12 can answer, Marisa. 13 A. I guess I just don't -- I don't 14 understand the question. I don't know 15 what you mean by drama. 16 Q. (By Mr. Cockrell) Do you know what 17 drama is? You've used the word several 18 times and other people have of documents 19 we've seen today. 20 Do you -- I ask again what would 21 be the purpose of adding drama to an 22 investigative report if it's truly an 23 investigative report?</p>	<p>1 MS. STROM: Objection. 2 A. It's hard for me to know without 3 talking about a specific sentence before 4 we've looked at specific emails or 5 specific sentences, it's hard for me to 6 know to understand out of context. 7 Q. (By Mr. Cockrell) Well, is drama 8 ever proper when making an investigative 9 report? 10 MS. STROM: Objection. 11 A. I still don't understand what you 12 mean by drama. 13 Q. (By Mr. Cockrell) What would you 14 normally think drama means? 15 MS. STROM: Objection. Bob, 16 if you're talking about a specific email 17 or a context, then you can give it to her 18 but she's answered many, many times -- 19 MR. COCKRELL: I've asked 20 what drama means to her. I would like an 21 answer please. 22 A. Like drama school? I just don't 23 understand what -- like, that word has a</p>
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<p>1 lot of different meanings and different 2 context. I guess that's so hard for me to 3 understand what the question is. 4 Q. Well, I'll narrow it down for you. 5 What does drama mean to an investigative 6 reporter? 7 MS. STROM: Objection. 8 Asked and answered. 9 A. Again, you have to ask an 10 investigative reporter in a specific 11 question on a specific moment. I just 12 don't know what -- I'm not closer to 13 understanding the question. 14 Q. (By Mr. Cockrell) What does drama 15 mean to an editor of an investigative 16 report? 17 MS. STROM: Objection. 18 A. It just -- I guess my -- I still 19 don't have context. 20 Q. (By Mr. Cockrell) Okay. Thank 21 you. 22 Can you pull up Document 1703, 23 Plaintiff's 67?</p>	<p>1 Q. On that document it says who is he 2 that says was sign off on the final? 3 A. I don't know. 4 (Off the record.) 5 Q. Okay. All right. 6 Let me take one more short break 7 and I think we're -- I've got one more 8 question. 9 If it's all about investigative 10 report and about make Megan Rondini, why 11 was special inquiry so prominent in the 12 story? 13 MS. STROM: Objection. You 14 can answer, Marisa. 15 A. The story is about Megan Rondini's 16 process of reporting what she perceived or 17 felt was a sexual assault to the police 18 officers and to her school. 19 And special inquiry as a term as 20 it is relevant to that process is why it 21 was used in the story and why it was asked 22 about to say Gary Hood. 23 Q. Okay. All right.</p>

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<p>1 MR. COCKRELL: Give us one 2 break real quick. 3 VIDEOGRAPHER: Off the 4 record 4:49. 5 (Recess was taken.) 6 VIDEOGRAPHER: Back on the 7 record 4:50. 8 MR. COCKRELL: Okay. I have 9 no further questions. But I would like to 10 leave the deposition open pending the 11 outcome of the redactions that we've yet 12 to review that BuzzFeed is going to 13 provide for us after they look at 14 everything. 15 Hopefully, I won't have to 16 bring you back and trouble you. 17 MS. STROM: And, of course, 18 I object because you've had the document 19 production for almost a year, so we'll 20 deal with that when we deal with that. 21 MR. COCKRELL: We'll deal 22 with it when we deal with it. Thank you. 23 VIDEOGRAPHER: This</p>	<p>1 concludes the deposition and we're off the 2 record at 4:50. 3 4 [The deposition was concluded at 5 4:50 p.m., and further deponent saith 6 not.] 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23</p>
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<p>1 CERTIFICATE 2 STATE OF ALABAMA ) 3 TUSCALOOSA COUNTY ) 4 I hereby certify that the above and 5 foregoing proceedings were taken down by 6 me in stenotype, and the questions and 7 answers thereto were reduced in transcript 8 form by computer-aided transcript under my 9 supervision, and that the foregoing 10 represents a true and correct transcript 11 of the proceedings occurring on said date 12 at said time. 13 I further certify that I am neither 14 of counsel nor of kin to the parties to 15 the action, nor am I anyway interested in 16 the results of said cause. 17 Signed February 1, 2021. 18 19 /s/ Nancy Pannell, CCR 20 NANCY PANNELL, CCR 21 Alabama CCR No. 30, Expires 9/30/2021 22 Commissioner for the State of Alabama at 23 Large, Commission expires 07/17/2021</p>	

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